

Marguerite McLean

100084-EI

From: beth.keating@akerman.com
Sent: Thursday, April 22, 2010 1:55 PM
To: Filings@psc.state.fl.us
Cc: rab@beggsllane.com; john.butler@fpl.com; jbeasley@ausley.com; john.burnett@pgnmail.com; Charles Beck; Kathryn Cowdery
Subject: Docket No. 100084-EI
Attachments: 20100422134537240.pdf

Attached for filing in the referenced Docket, please find the Comments of Florida Public Utilities Company. Please do not hesitate to contact me if you have any questions.

Sincerely,
 Beth Keating
 Akerman Senterfitt
 (850) 224-9634
 (850) 521-8002 (direct)
 beth.keating@akerman.com

A. Person Responsible for this Filing:

Beth Keating
 Akerman Senterfitt
 106 East College Ave, Suite 1200
 Tallahassee, FL 32301
 (850) 224-9634
 (850) 521-8002 (direct)
 (850) 222-0103 (fax)
 beth.keating@akerman.com

B. Docket No. 100084-EI: In re: Initiation of Rulemaking to Adopt Rule 25-6.0424, F.A.C., Petition for Mid-Course Correction

C. Filed on behalf of: Florida Public Utilities Company

D. Pages: 5

E. Comments on Mid Course Schedules (Schedule E1)



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DOCUMENT NUMBER-DATE

03133 APR 22 09

FPSC-COMMISSION CLERK

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Suite 1200
106 East College Avenue
Tallahassee, FL 32301

www.akerman.com

850 224 9634 *tel* 850 222 0103 *fax*

April 22, 2010

Electronic Filing

Ms. Ann Cole
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

**Re: Docket No. 100084-EI: Initiation of Rulemaking to Adopt Rule 25-6.0424, F.A.C.,
Petition for Mid-Course Correction**

Dear Ms. Cole:

On behalf of Florida Public Utilities Company (FPUC), I am enclosing for filing in the referenced Docket, FPUC's suggested changes to Schedule EI, which was included as part of Attachment A to Staff's March 25, 2010 recommendation in this Docket. FPUC offers these suggestions to allow this Schedule to better recognize the GSLD apportionment for FPUC's Northeast Division. FPUC recognizes, however, that these suggestions may not fit or accommodate Mid-Course Correction filings to be made by other utilities. As such, FPUC would also suggest that these suggestions be included as an alternative, or optional, version of the form to be used in appropriate circumstances.

Sincerely,

Beth Keating
106 East College Avenue, Suite 1200
Tallahassee, FL 32302-1877
Phone: (850) 521-8002

Enclosures

cc: Kathryn Cowdery, Office of the General Counsel
Parties of Record

DOCUMENT NUMBER-DATE

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FPSC-COMMISSION CLERK

SCHEDULE E1

1. FPUC suggests including additional lines to accommodate FPUC's GSLD1 apportionment for the Northeast Florida division. As such, on FPUC's proposed revised Schedule E1, additional lines 27a-27c have been added.

2. FPUC also suggests moving the Revenue Tax Factor and the Fuel Factor Adjusted for Taxes (lines 30 and 31 in Attachment A, page 10). Instead, FPUC would add categories to become page 2 of Schedule E1, that would reflect Apportionment of Demand and Non-Demand Costs, the GSLD1 Purchased Power Cost Recovery Factors, and Other Classes Purchased Power Cost Recovery Factors. The appropriate Revenue Tax Factor would be included, as required, under each category, and the appropriate categories would then reflect the appropriate adjustments for Taxes and Rounding.

3. Finally, FPUC would suggest the addition of a page that would allow the company to reflect the calculation of the cost recovery according to each rate class. (Page 3 of FPUC's attached proposed revised Schedule E1.)

DOCUMENT NUMBER-DATE

03133 APR 22 9

FPSC-COMMISSION CLERK

FLORIDA PUBLIC UTILITIES COMPANY
FUEL AND PURCHASED POWER
COST RECOVERY CLAUSE CALCULATION

FERNANDINA BEACH (NORTHEAST DIVISION)

		(a)	(b)	(c)
		DOLLARS	MWH	CENTS/KWH
1	Fuel Cost of System Net Generation (E3)			
2	Nuclear Fuel Disposal Costs (E2)			
3	Coal Car Investment			
4	Adjustments to Fuel Cost			
5	TOTAL COST OF GENERATED POWER (LINE 1 THRU 4)	_____	_____	_____
6	Fuel Cost of Purchased Power (Exclusive of Economy) (E7)			
7	Energy Cost of Sched C & X Econ Purch (Broker) (E9)			
8	Energy Cost of Other Econ Purch (Non-Broker) (E9)			
9	Energy Cost of Sched E Economy Purch (E9)			
10	Demand & Non Fuel Cost of Purch Power (E2)			
10a	Demand Costs of Purchased Power			
10b	Non-fuel Energy & Customer Costs of Purchased Power			
11	Energy Payments to Qualifying Facilities (E8a)	_____	_____	_____
12	TOTAL COST OF PURCHASED POWER (LINE 6 THRU 11)	_____	_____	_____
13	TOTAL AVAILABLE KWH (LINE 5 + LINE 12)		=====	
14	Fuel Cost of Economy Sales (E6)			
15	Gain on Economy Sales (E6)			
16	Fuel Cost of Unit Power Sales (SL2 Partpts) (E6)			
17	Fuel Cost of Other Power Sales	_____	_____	_____
18	TOTAL FUEL COST AND GAINS OF POWER SALES	_____	_____	_____
19	Net Inadvertent Interchange	_____	_____	_____
20	TOTAL FUEL & NET POWER TRANSACTIONS (LINE 5 + 12 + 18 + 19)	=====	=====	=====
21	Net Unbilled Sales			
22	Company Use			
23	T & D Losses	_____	_____	_____
24	SYSTEM MWH SALES			
25	Wholesale MWH Sales			
26	Jurisdictional MWH Sales			
26a	Jurisdictional Loss Multiplier			
27	Jurisdictional MWH Sales Adjusted for Line Losses			
27a	GSLD1 MWH Sales			
27b	Other Classes MWH Sales			
27c	GSLD1 CP KW			
28	GPIF **			
29	TRUE-UP (OVER) UNDER RECOVERY **	_____	_____	_____
30	TOTAL JURISDICTIONAL FUEL COST			
30a	Demand Purchased Power Costs (Line 10a)			
30b	Non-demand Purchased Power Costs (Lines 6 + 10b + 11)			
30c	True up Over/Under Recovery (Line 29)			

FLORIDA PUBLIC UTILITIES COMPANY
FUEL AND PURCHASED POWER
COST RECOVERY CLAUSE CALCULATION

FERNANDINA BEACH (NORTHEAST DIVISION)

		(a)	(b)	(c)
		DOLLARS	MWH	CENTS/KWH
APPORTIONMENT OF DEMAND COSTS				
31	Total Demand Costs (Line 30a)			
32	GSLD1 Portion of Demand Costs (Line 30a) Including Line Losses(Line 27c x \$2.96)			
33	Balance to Other Classes			
APPORTIONMENT OF NON-DEMAND COSTS				
34	Total Non-demand Costs(Line 30b)			
35	Total KWH Purchased (Line 12)			
36	Average Cost per KWH Purchased			
37	Average Cost Adjusted for Line Losses (Line 36 x 1.03)			
38	GSLD1 Non-demand Costs (Line 27a x Line 37)			
39	Balance to Other Classes			
GSLD1 PURCHASED POWER COST RECOVERY FACTORS				
40a	Total GSLD1 Demand Costs (Line 32)			
40b	Revenue Tax Factor			
40c	GSLD1 Demand Purchased Power Factor Adjusted for Taxes & Rounded			
40d	Total Current GSLD1 Non-demand Costs(Line 38)			
40e	Total Non-demand Costs Including True-up			
40f	Revenue Tax Factor			
40g	GSLD1 Non-demand Costs Adjusted for Taxes & Rounded			
OTHER CLASSES PURCHASED POWER COST RECOVERY FACTORS				
41a	Total Demand & Non-demand Purchased Power Costs of Other Classes(Line 33 + 39)			
41b	Less: Total Demand Cost Recovery			
41c	Total Other Costs to be Recovered			
41d	Other Classes' Portion of True-up (Line 30c)			
41e	Total Demand & Non-demand Costs Including True-up			
42	Revenue Tax Factor			
43	Other Classes Purchased Power Factor Adjusted for Taxes & Rounded			

FLORIDA PUBLIC UTILITIES COMPANY
FUEL AND PURCHASED POWER
COST RECOVERY CLAUSE CALCULATION

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FERNANDINA BEACH (NORTHEAST DIVISION)

	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
			(1)/(2)*4,380			(3)*(4)	(1)*(5)	(6)/Total Col. (6)	(7)/Total Col. (7)
Rate Schedule	KWH Sales	12 CP Load Factor	CP KW At Meter	Demand Loss Factor	Energy Loss Factor	CP KW At GEN.	KWH At GEN.	12 CP Demand Percentage	Energy Percentage
44 RS									
45 GS									
46 GSD									
47 GSLD									
48 OL									
49 SL									
TOTAL									

	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)
	12/13 * (8)	1/13 * (9)	(10) + (11) Demand Allocation Percentage	Tot. Col. 13 * (12)	(13)/(1)	(14) * 1.00072 Demand Cost Recovery	Other Charges	(15) + (16)
Rate Schedule	12/13 Of 12 CP	1/13 Of Energy	Demand Allocation Percentage	Demand Dollars	Demand Cost Recovery	Demand Cost Recovery Adj for Taxes	Other Charges	Levelized Adjustment
50 RS								
51 GS								
52 GSD								
53 GSLD								
54 OL								
55 SL								
TOTAL								

Step Rate Allocation for Residential Customers

	(18)	(19)	(20)	(21)
				(19) * (20)
Rate Schedule	Allocation	Annual kWh	Levelized Adj.	Revenues
48 RS				
49 RS				
50 RS				
51 RS	Total Sales			