FILED SEP 05, 2013 DOCUMENT NO. 05276-13 FPSC - COMMISSION CLERK

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OFFICE OF THE GENERAL COUNSEL S. CURTIS KISER GENERAL COUNSEL (850) 413-6199

Hublic Service Commission

September 5, 2013

Cheryl M. Martin Florida Public Utilities Company 1641 Worthington Road Suite 220 West Palm Beach, FL 33409-6703

STAFF'S FIRST DATA REQUEST

RE: Docket No. 130205-EI- Commission review of numeric conservation goals (Florida Public Utilities Company).

Dear Ms. Martin

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC or Company), provide responses to the following data requests.

- 1. Did FPUC consider using JEA as a proxy for its conservation goals?
- a. If yes, why did the Company propose to use FPL as a proxy instead of JEA?
- b. If no, would JEA be a reasonable proxy for FPUC's conservation goals? Please explain.

2. Please complete the table below summarizing FPUC's peak demand.

	Northwest Division	Northeast Division
	Peak Demand (MW)	Peak Demand (MW)
2009		
2010		
2011		
2012		

3. Please complete the table below summarizing FPUC's net-energy for load (NEL).

	Northwest Division NEL (GWh)	Northeast Division NEL (GWh)
2009		
2010		
2011		
2012		

4. Please complete the table below summarizing FPUC's estimated 2014 and 2015 bill impact (\$/1,000 kWh) based on the estimated costs for outside consultants set forth in FPUC's August 28, 2013 Petition to Establish Goals Using Proxy Methodology (Petition).

	\$300,000 Cost Estimate	\$400,000 Cost Estimate
	\$/1,000 kWh	\$/1,000 kWh
2014		
2015		

- 5. Please confirm that the formula proposed in Column C of Tables 1 and 2 in Exhibit A of FPUC's Petition should be the ratio of Column B/Column A instead of Column A/Column B.
- 6. Given that FPL's and Gulf's current goals include demand and energy reductions associated with 2-year payback measures and FPUC's goals do not include such reductions, how would FPUC account for a reduction in its goals if the reductions associated with these measures were removed from the FPL's and Gulf's goals?
- 7. Please provide an example of how each key issue listed on page 7 of FPUC's Petition would impact demand and energy reductions from DSM.
- 8. Is it FPUC's position that participating in the full goal-setting process would yield results for the Company that are similar to the results based on its proposed proxy methodology? Please explain.
- 9. In contrast to a generating utility, does FPUC being a non-generating utility have any bearing on the appropriateness of using a proxy methodology in this case? Please explain.

Please file the original and five copies of the requested information by September 25, 2013, with Ms. Ann Cole, Commission Clerk, Office of Commission Clerk, 2540 Shumard Oak Boulevard, Tallahassee, Florida, 32399-0850. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,

Charles W. Murphy Senior Attorney

CWM/dml

cc: Office of Commission Clerk