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# Public Service Commission

June 16, 2022

Beth Keating  
Gunster Law Firm  
215 South Monroe Street, Suite 601  
Tallahassee, Florida 32301  
[bkeating@gunster.com](mailto:bkeating@gunster.com)

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

RE: Docket No. 20220001-EI – Fuel and purchased power cost recovery clause with generating performance incentive factor.

Dear Ms. Keating:

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

1. Please refer to Florida Public Utilities Company's (FPUC or Company) "Petition for Approval of Mid-Course Correction" (MCC Petition), dated June 14, 2022, filed in Docket No. 20220001-EI.<sup>1</sup> Please specify the Company's MCC percentage following the methodology prescribed in Rule 25-6.0424(1)(a), Florida Administrative Code.
2. Please specify the exact ranges/beginning and ending dates of FPUC's July, August, and September 2022 billing cycles.
3. Please identify the exact date when the 2022 fuel cost recovery factors, authorized by Order No. PSC- 2021-0442-FOF-EI, began being charged to customers.<sup>2</sup>
4. Please refer to the MCC Petition, Schedule E1-A. Please provide an estimate of the bill impact to a typical residential customer using 1,000 kWh of electricity a month, if the Company were to recover the entire current actual/estimated under-recovery through July 2022 of \$8,471,112 through this MCC proceeding.
5. Please refer to the MCC Petition, Schedule E-10. Please provide the bill impacts to typical (i.e., typical based on a conventional or average level of usage) general service

<sup>1</sup>Document No. 03889-2022.

<sup>2</sup>Order No. PSC-2021-0442-FOF-EI, issued November 30, 2021, in Docket No. 20210001-EI, *In re: Fuel and purchased power cost recovery clause with generating performance incentive factor*.

(large and small) customers similar to that performed for the residential class shown on this schedule.

6. Please refer to the MCC Petition, Schedule C1. Please specify the source of the monthly interest rates (and if available, the series title, i.e., 30-day commercial paper, Federal Funds Rate, etc.) used in the derivation of the actual true-up shown on this schedule.
7. Please state whether the Company plans on instituting any different processes, procedures, and/or measures related to fuel cost forecasting of its purchase power agreements (PPA) as a result of requiring a mid-course correction of its PPA-related charges. If so, please explain.
8. Please describe the Company's anticipated process and timeline for notifying its customers of the proposed action it has requested through its MCC Petition. Please also provide copies of any notifications that were previously, or will be, provided to customers regarding the actions requested in the MCC Petition.
9. Please provide a schedule showing the commodity-only natural gas fuel prices used to develop the Company's currently-authorized fuel cost recovery factors.
10. Please provide a schedule showing the commodity-only natural gas fuel prices used to develop the Company's proposed mid-course fuel cost recovery factors.
11. Please provide a month-by-month schedule/comparison of the assumed fuel-related PPA costs and actual fuel-related PPA costs for all of 2021, and January through April of 2022.
12. Please generally discuss how changes in market fuel prices, with a focus on natural gas, affect the Company's PPAs. As in, what is the process by which changes in market or fuel prices change the Company's PPA contract pricing.
13. Are any other factors of the Company's existing PPAs driving the need for a MCC, or is the MCC solely related to changes in market fuel prices? If other factors are driving the MCC, please list and explain them.
14. Please explain how/why the Company believes its total actual/estimated true-up through July 2022, as shown on Schedule E1-A of the MCC Petition, in the amount of (\$8,471,112), will be "lower" (i.e., less under recovery) than its current true up as reported through the Company's April 2022 A-Schedules in the amount of (\$9,086,858).<sup>3</sup>

## Documents

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<sup>3</sup>Document No. 03038-2022.

Staff's First Data Request

June 16, 2022

Page 3

Please provide a sample PPA contract (or provision of) detailing how changes in market fuel prices change the cost of the PPA to FPUC.

Please file all responses electronically no later than the close of business on Monday, June 21, 2022 from the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless

Suzanne Brownless

Senior Attorney

SBr/ds

cc: Office of Commission Clerk