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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

December 13, 2023

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

**STAFF'S FIRST DATA REQUEST**  
**Via E-mail**

Matt Everngam  
Director - Regulatory Affairs  
208 Wildlight Ave.  
Yulee, FL 32097

**Re: Docket No. 20230124-GU: Petition for approval of limited variance from area extension program (AEP) tariff by Florida Public Utilities Company.**

Dear Ms. Keating and Mr. Everngam:

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

1. Please provide a detailed breakdown of the costs related to the conversion of mains and services (\$219,900) for the two communities mentioned in Paragraph 10 of the petition.
2. Please provide a detailed breakdown of the costs related to the behind-the-meter conversions (\$573,548) mentioned in Paragraph 11 of the petition. As part of this response, please identify the internal resources and information from other subsidiaries of Chesapeake Utilities Corporation that FPUC relied upon in calculating these costs.
3. Paragraph 12 of the petition states that a consultant determined that the market value of the Community Gas System's (CGS) is \$629,607. Please provide a copy of the consultant's independent assessment.
4. Please explain how the consultant was selected, the cost for their work in preparing the assessment, and how FPUC will recover these costs.
5. Please provide staff with an organizational chart showing the relationship between FPUC and Crescent Propane.
6. Are there any other propane providers in the City of Newberry? If yes, how many and who are they? Does FPUC currently have plans to acquire any of these propane systems?

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7. Please provide the calculations for the fixed \$33.06 AEP charge and the \$2.03 per therm charge as mentioned in Paragraph 15 of the petition.
8. Please explain how the utility determined the 11.7 therms per household per month usage estimate in Paragraph 15 of the petition.
9. Please explain whether Paragraph 16 of the petition should refer to 11.7 therms and not “/dth”.
10. Please provide cost support for the \$15,443 of total annual savings for customers with reduced bills in the two communities mentioned in Paragraph 16 of the petition. As part of this response, please also include the calculations supporting the conclusion that 56% of current customers will realize these savings.
11. Please provide cost support for the \$173,941 of total annual projected savings in the two communities at the end of the AEP period mentioned in Paragraph 16 of the petition. As part of this response, please also include the calculations supporting the conclusion that “almost all of the active customers” will realize these savings.
12. Please provide a detailed breakdown showing each step of the MACC calculation (\$932,514) mentioned in paragraph 16 of the petition.
13. For any facilities installed behind the meter, please explain the accounting treatment for those facilities in between rate cases and in the next rate case.
14. Please explain in detail the process of converting a propane system to natural gas. What changes need to be made to the system?
15. Will the customers have to buy new appliances after the conversion from propane to natural gas?
16. Please discuss in detail when and how customers in the two CGS’s will be notified of their conversion from propane to natural gas and the AEP charge. What recourse does a customer have if they object to the AEP charge?
17. What will happen if a customer wants to stay with propane?
18. In paragraph 11 of the petition it states that conversions will include the changing of propane hookups to common household appliances to facilitate the delivery of natural gas. What appliances do customers typically run with propane in the two CGS’s subject to the petition?
19. In Paragraph 17 of the petition it states that the AEP and the AEP billing period will begin after the new billing system goes live in August of 2024. Please clarify that the AEP and AEP billing period is expected to start in August of 2024.
20. Will the AEP charge be shown separately on the bill or rolled into the per therm charge?

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21. Please explain how FPUC will ensure that the full AEP amount will be collected within the 6-year AEP period, given its proposal for a volumetric AEP charge.
22. How would the volumetric charge be affected if not all customers want to convert?
23. Please provide all orders approving similar conversions as mentioned in Paragraph 11 of the petition.

Please file all responses electronically no later than January 3, 2024 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. Please call me at 850.413.6554 if you have any questions.

Thank you,

/s/Oakley Ward  
Public Utility Analyst II  
[oward@psc.state.fl.us](mailto:oward@psc.state.fl.us)

CC: Office of Commission Clerk