

STATE OF FLORIDA

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OFFICE OF THE GENERAL COUNSEL
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Public Service Commission

September 12, 2024

STAFF'S FIRST DATA REQUEST
via email

Beth Keating, Esquire
Florida Public Utilities Company
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

RE: Docket No. 20240099-EI – Petition for rate increase by Florida Public Utilities Company.

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 the direct testimony of Florida Public Utilities Company (Company or FPUC) witness Michelle Napier, page 9, lines 1-8. Please provide a mathematical example of how the “Modified Distrigas for Florida business units” operates. Please also provide an example of this allocator being applied/being used.
2. Please refer to the direct testimony of Florida Public Utilities Company (Company or FPUC) witness Michelle Napier, page 9, lines 15-22. Please briefly discuss how the projected 2025 test year fuel revenue and expense were determined/estimated.

3. Please refer to the direct testimony of FPUC witness Napier, page 11, lines 10-14. Please confirm the Company has removed unamortized rate case expense from its working capital for the 2025 projected test year.

4. Please refer to the direct testimony of FPUC witness Napier, page 14, lines 16-22 for the following requests.
 - a) In a base rate proceeding, has the Company ever received approval to include full-year investment amounts for assets that were not projected to be in service for entire projected test year? If so, please discuss.
 - b) Please identify the total 2025 test year revenue requirement associated with this adjustment.

5. Please refer to the direct testimony of FPUC witness Napier, page 16, lines 15-23 for the following requests. Is the Company aware of any other investor-owned Florida electric utility recovering all its tree trimming and inspection costs through the Storm Protection Plan Cost Recovery Clause? If so, please identify the authorizing order(s).

6. Please refer to the direct testimony of FPUC witness Napier, pages 16, line 15, through page 17, line 4. Please confirm the Company does not have any tree trimming and inspection costs currently included in its projected 2025 test year.

7. Please refer to the direct testimony of FPUC witness Napier, page 17, lines 5-9. Please provide the complete calculation relating to this adjustment for "Edison Electric Institute" association dues.

8. Please refer to Minimum Filing Requirements (MFR) Schedule C-7 (2025), page 2 of 8. Please describe the adjustment appearing on line 5 for Account 557 – Other Expenses in the amount of \$259,010.
9. Please refer to MFR Schedule C-7 (2025), page 5 of 8. Please discuss, with specificity, how each of the trend factors listed on this page were developed. Please also provide any source documentation (i.e., internal or third-party projections) used in developing the trend factors.
10. Please refer to the direct testimony of FPUC witness Napier, page 24, lines 8-10. If Docket No. 20240099-EI does eventually go to hearing, how and when would the Florida Public Service Commission be apprised of the additional rate case costs the Company would presumably wish to recover?
11. Please refer to the direct testimony of FPUC witness Napier, page 25, lines 10-15. Please provide the order number authorizing the depreciation rates used in determining plant balance changes for December 2022?
12. Please refer to the direct testimony of FPUC witness Napier, page 25, line 23, through page 26, line 1. Please explain or clarify the statement “[t]he Company’s current technology, (SAP), which is over 20 years old and at the end of life, is currently being installed.”
13. Please refer to MFR Schedule B-7 (2025), page 12 of 12, line 31. Please elaborate on the basis of utilizing Florida common gas plant depreciation rates for this rate case filing

14. Please refer to MFR Schedule C-14, page 1 of 1, line 17 for the following requests.
 - a) Please explain the basis for the increase in advertising expense from 2023 to 2025.
 - b) Does the Company currently have any contracts or other commitments in place for its assumed 2025 advertising efforts? If so, please discuss.

15. Please refer to MFR Schedule C-3, page 3 of 3, line 12 for the following request.
 - a) Please provide the complete calculation relating to this adjustment to eliminate 5 percent of economic development expenses.
 - b) Please discuss the Company's planned economic development activities for the 2025 projected test year.

16. Please refer to the direct testimony of FPUC witness Michael Galtman, page 9, line 6, through page 10, line 23. Please provide mathematical examples of how the "task-based allocation" and the "capital expenditure-based allocation" are formulated and applied/used.

17. Please refer to the direct testimony of FPUC witness Kim Estrada, page 5, line 1, through page 7, line 2 for the following requests.
 - a) What are the total cost and the total 2025 projected test year cost (being assessed to FPUC) associated with the "Five9 Platform" that is discussed in this section of testimony?
 - b) What is the total 2025 projected test year cost and expected roll-out date associated with the incremental functionality/"future enhancements" being discussed in this section of testimony beginning on page 6, line 10?

18. Please refer to the direct testimony of FPUC witness Vikrant Gadgil, page 8, lines 1-3. What are the total cost and the total 2025 projected test year cost (being assessed to FPUC) associated with the “SAP platform” that is discussed in this section of testimony?
19. Please refer to the direct testimony of FPUC witness Gadgil, page 16, lines 12-16. What is the total 2025 projected test year cost (being assessed to FPUC) associated with information technology investments discussed in this testimony?
20. Please refer to the direct testimony of FPUC witness Devon Rudolff-Daffinson, page 8, lines 3-9. Specifically line 7, did “[Chesapeake Utilities Corporation]” raise its merit increase level to 3.5% for all operating units, or only FPUC?
21. Please refer to the direct testimony of FPUC witness Galtman, page 8, line 3. Please provide a copy of the cost allocation manual identified in this section of testimony.
22. Please refer to the direct testimony of FPUC witness Devon Rudolff-Daffinson, page 10, lines 1-7. Please provide a copy of the analysis performed by “Institutional Shareholder Services, Inc.” that is discussed in this section of testimony.

Staff's First Data Request

September 12, 2024

Page 6

Please file all responses electronically no later than Thursday, September 26, 2024, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr/ds

cc: Office of Commission Clerk