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DIVISION OF ECONOMICS
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Public Service Commission

September 19, 2024

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

STAFF'S FIRST DATA REQUEST
VIA E-MAIL

Michelle D. Napier
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, FL 33411

Re: Docket No. 20240135-GU - Petition for approval of swing service rider, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.

Dear Ms. Keating and Ms. Napier:

By this letter, the Commission staff respectfully requests Florida Public Utilities Company (FPUC) to provide responses to the following questions, regarding the petition for approval of swing service rider rates for January through December 2025.

1. Order No. PSC-16-0422-TRF-GU, which established the swing service rider, ordered that it be handled in a manner similar to the Gas Reliability Infrastructure Program (GRIP), both of which require the company to file annually by September 1. Please discuss any potential impacts that would arise if the Commission were to require FPUC to file the swing service rider by August rather than by September.
2. Please refer to the question beginning on page 3 of Witness Laster's testimony, line 21. The witness states that the Swing Service Rider was found to have slightly lower actual costs than projected, but the consolidated purchased gas adjustment (PGA) recovery (cap) was not revised to reflect the changes.
 - a. Please confirm the time period which this refers to.
 - b. Please explain whether the PGA is being subsidized by the Swing Service Rider overpayment.

3. Please refer to page 5 of Witness Laster's testimony, lines 3-8. Please state which month the transportation outdoor lighting customers initiated service with FPUC. If applicable, please explain whether FPUC intends to recover costs from these customers incurred in 2024.
4. Please refer to page 5 of Witness Laster's testimony, lines 8-9.
 - a. Explain why FPUC has elected to remove Interruptible (COM-INTT) and Natural Gas Vehicle (COM-NGVT) from the list of customers impacted by the swing service rider.
 - b. Please explain whether COM-INTT and/or COM-NGVT are sales customers.
 - c. If COM-INTT and/or COM-NGVT are considered sales customers, please explain whether the PGA was collected from them during the 01/01/2024 – 12/31/2024 service period.
 - d. Please state how much, in dollars, was collected from COM-INTT and/or COM-NGVT customers during the 01/01/2024 – 12/31/2024 service period.
5. Please provide copies of schedules A through D in Excel with formulas unlocked.
6. Please refer to Schedule D of Exhibit SKL-1 for the following questions.
 - a. Please explain why the following actual costs from the period of 07/01/2022-06/30/2023 have been discontinued: Nassau County William Burgess, Nassau County, Port of Palm Beach, Riviera Lateral, New Smyrna, Belvedere, Haines City CFG, Pensacola NW, Auburndale, Western PB County, Wildlight 1C, Wildlight 1B, Winter Haven, New River RNG LLC, Cardinal Technology LLC, and Snell & Wilmer LLP. Please state the dates on which the aforementioned services were discontinued.
 - b. Please explain the reasons for the Peninsula Pipeline cost change from \$0 in 2022/2023 to \$24,429,013 in 2023/2024 and provide a description of the services Peninsula Pipeline provides to FPUC.
 - c. Please explain the reasons for the Baker & Hostetler LLP cost change from \$8,146 in 2022/2023 to \$2,814 in 2023/2024 and provide a description of the services Baker & Hostetler LLP provides to FPUC.
 - d. Please explain the reasons for the Convergence Solutions LLC change from \$150,000 in 2022/2023 to \$195,960 in 2023/2024 and provide a description of the services Convergence Solutions LLC provides to FPUC.
 - e. Please provide a description of the services provided by employees under the payroll allocation.

- f. Please explain the reasons for the Pierpont & McLelland change from \$90,142 in 2022/2023 to \$70,642 in 2023/2024 and provide a description of the services Pierpont & McLelland provides to FPUC.
 - g. Please explain the reasons for the S&P Global Platts change from \$23,688 in 2022/2023 to \$55,999 in 2023/2024 and provide a description of the services S&P Global Platts provides to FPUC.
 - h. Please explain the reasons for the Snell & Wilmer LLP change from \$8,789 in 2022/2023 to \$78,373 in 2023/2024 and provide a description of the services Snell & Wilmer LLP provides to FPUC.
 - i. Please explain the reasons for the Arden FPU AGL change from \$8,297 in 2022/2023 to \$29,265 in 2023/2024 and provide a description of the services Arden FPU AGL provides to FPUC.
 - j. Please explain the reasons for the Emera Energy Services Inc. change from \$608,898 in 2022/2023 to \$1,148,544 in 2023/2024 and provide a description of the services Emera Energy Services Inc. provides to FPUC.
 - k. Please explain the reasons for the Marlin Gas Services LLC change from \$3,726,982 in 2022/2023 to \$2,621,162 in 2023/2024 and provide a description of the services Marlin Gas Services LLC provides to FPUC.
7. Please describe any potential impacts to the swing service program or FPUC's workload if the Commission ordered the utility to file its future annual swing service petition on August 1 of each year, as opposed to September 1.

Please file all responses electronically no later than October 3, 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 and add this email address on the service list block associated with the PSC attorney assigned to this docket. Please contact me at kmcclell@psc.state.fl.us or at 850.413.6814 if you have any questions. Thank you,

/s/Kate McClelland

Kate McClelland
Public Utility Analyst II

cc: Office of the Commission Clerk (Docket No. 20240135-GU)