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OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

October 8, 2024

STAFF'S FOURTH 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 provide the data shown in MFR Schedule F-7 in Excel format with cells and formulas unlocked.
2. Please refer to FPUC witness Taylor's direct testimony, page 7, lines 3-5. Witness Taylor states, "The projections of normal UPC developed from the regression analysis, and normal HDD and CDD, were multiplied by Company-provided customer count forecasts to calculate projected Normal usage in kWh."
 - a) Please explain how the "Company-provided" customer count forecasts, as shown on MFR Schedule F-7, page 17 of 21, were derived.

- b) If regression modeling was utilized when developing FPUC's customer forecast, please explain how the regression equations were developed. Include in your response the selection of independent variables and how they were applied to specific rate classes and business units. Please also include summary statistics for each equation.
- c) Please explain and provide a numeric example, using the residential class, of FPUC's following customer forecast adjustment statement in MFR Schedule F-5, Page 1: "Forecasts of the number of customers in each service classification were developed using a time trend based on 2020 to 2023 data and adjusted *with a forecasted number of customers by class.*" (italics added)
- d) MFR Schedule F-7 provides model description of UPC models. To the extent FPUC prepared "adjustment" forecasts of number of customers by class not based on time trend, as indicated in MFR Schedule F-5, Page 1, please provide the same detail pertaining to such customer forecast models as was provided for FPUC's UPC models, or provide detail based on whatever modeling methodology was used.
- e) For FPUC's UPC models, explain why FPUC determined not to include economic variables, as it did in last rate proceeding (Docket No. 20140025-EI), such as real personal income, or electricity price in its models.
- f) Why did FPUC use a time trend model for projecting customer growth rather than taking an econometric approach, as it did in last rate proceeding (Docket No. 20140025-EI), using typical drivers of change in customers such as population, real personal income, etc.

3. Please provide the Company's billed kWh projections (in Excel format, with cells and formulas unlocked) from May 2024 to December 2025 (for Residential, Commercial Small, and Commercial rate classes) for both the Northeast and Northwest Service Territories, as described by witness Taylor on page 6, lines 21-23, and page 7, lines 1 of his direct testimony.

4. Please refer to MFR E-13c, which details the demand billing determinants for the GSD, GSDL, and GSLD1 rate classes.
 - a) Please provide the Company's historical and forecasted demand for each applicable rate class. Please also provide the historical and forecasted demand by division (Northeast and Northwest) and system total (Northeast + Northwest).
 - b) Please explain how the demand charges for the test year were developed, and by whom.
 - c) Please provide (in Excel format, with cells and formulas unlocked) all models/forecasts, including assumptions, data, equations, and summary statistics for both the model and the forecast used to derive the demand charges shown in MFR E-13c.

5. Please refer to witness Taylor's direct testimony, page 5, lines 20-22.
 - a) Please explain why FPUC elected to utilize a 10-year historical period to calculate normal weather. Please provide any supporting documentation

- b) Please compare the 10-year normal weather data (CDDs and HDDs) to the weather data period utilized in FPUC's last rate case (Docket No. 20140025-EI).
6. How do FPUC's models account for specific events for the 2025 test year, such as new housing developments, port expansions, and/or new commercial expansions/contractions in the service area, which may significantly impact customers, sales, and demand?
7. Please identify all FPSC dockets or other filings in which FPUC presented the same customer and usage forecasts used in this proceeding and explain how they were used in those dockets or other filings.
8. Please identify all FPSC dockets which were opened after April 2024 in which FPUC filed customer or usage forecasts which were different from the forecasts used in this proceeding. For each such docket, explain why a different forecast was used and how those differed from the forecasts in the instant case.
9. When discussing the Large Commercial and Industrial Rate Class usage forecasts, witness Taylor testifies that, "FPUC personnel developed forecasts for their largest customers within the Commercial Large and Industrial classes to account for any changes in load expected for these customers."
- a) Please provide the 2024 historic base year +1 and the 2025 test year customer and energy sales forecasts for the Commercial Large and Industrial rate classes.

- b) Please describe how the load forecasts for the Commercial Large and Industrial classes were developed, including how customer or usage growth, if any, was accounted for.
10. Beginning with the first forecasted monthly data point (May 2024) that FPUC used for its model projections by service territory through the most recent month for which actual data is available, please provide the following:
- a) A side-by-side comparison of FPUC's monthly projected customer count and UPC to FPUC's actual monthly customer count and UPC (for each rate class).
 - b) A causative explanation for any forecast-to-actual deviations greater than 15 percent for UPC and 3 percent for customers.

11. Please provide 0 Year through 3 Year company forecast error rates for Total Customers and Total Energy Sales, for 2020, 2021, 2022, and 2023, with average error rate data, as shown below:

Year	Accuracy of Total Customers Forecasts*					
	Forecast Error Rate (%)				0-3 Year Error (%)	
	Years Prior**				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2020						
2021						
2022						
2023						
Average						

*The Company's officially adopted annual forecast of total customers for both service territories

**Examples: In the column '3 Years,' row '2020', enter the percent error in the Company's 2017 forecast of 2020 customers. Similarly, in the column '0 Years', row '2023', enter the percent error in the Company's 2023 forecast of 2023 customers.

Year	Accuracy of Total Energy Sales Forecasts*					
	Forecast Error Rate (%)				0-3 Year Error (%)	
	Years Prior**				Average	Absolute Average
	3 Years	2 Years	1 Year	0 Years		
2020						
2021						
2022						
2023						
Average						

*The Company's officially adopted annual forecast of total energy sales for both service territories

**Examples: In the column '3 Years,' row '2020', enter the percent error in the Company's 2017 forecast of 2020 total energy sales. Similarly, in the column '0 Years', row '2023', enter the percent error in the Company's 2023 forecast of 2023 total energy sales.

12. For each customer class, and by division (Northeast, Northwest), please provide FPUC's annual actual customers, UPC and demand for 2015 through 2023, annual actual/forecast of customers, UPC, and demand for 2024, and annual forecast of customers, UPC, and demand for 2025. Please provide in an Excel spreadsheet.

Please file all responses electronically no later than Tuesday, October 22, 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