

STATE OF FLORIDA

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Public Service Commission

October 15, 2024

STAFF'S SIXTH 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:

Please refer to MFR Schedule B-11, line numbers 2, 4, and 6 through 11 for the following questions:

1. Please detail the necessity for each of the listed additions.
2. Please provide a brief description of the anticipated activities associated with each of the listed additions.
3. Please provide a timeline for each of the listed additions detailing the anticipated activities. As part of this response, please indicate the completion status of each activity, and the anticipated completion date for each activity pending completion.

4. Please provide the estimated total cost that FPUC is requesting be included in base rates for each of the listed additions. As part of this response, please provide an itemized breakdown of what is included in the cost estimate, and explain how the cost estimate was developed.
5. Please explain the process FPUC intends to use to select third party contractors for each addition requiring contractor selections. For the additions that the Utility has already selected contractors for, please explain how the contractor was selected, indicate whether the selected contractor was the least cost contractor and if not, why not, and provide the reason for dismissal for all other contractors considered, if any.
6. Please provide the estimated total O&M expense associated with each of the listed additions. As part of this response, please provide an itemized breakdown of what is included in the cost estimate, and detail how third party contractors will be selected to conduct O&M activities.
7. For each of the listed additions, please identify all alternatives FPUC considered to minimize the rate impact to customers. If no alternatives were considered, please explain why for each.
8. For each of the listed additions, please explain in detail how denying each addition would affect FPUC.

9. Please refer to line number 2, and MFR Schedule B-13, line number 20. Please explain the difference in the costs listed for this project on these schedules.
10. Please refer to line number 4, and MFR Schedule B-13, page 3, line number 15. Please explain the difference in the costs listed for this project on these schedules.

Please refer to MFR Schedule B-13, page 3, line numbers 16, 21, 24 through 25, and 28 through 30 for the following questions:

11. Please detail the necessity for each of the listed projects.
12. Please provide a brief description of the anticipated activities associated with each of the listed projects.
13. Please provide a timeline for each of the listed projects detailing the anticipated activities. As part of this response, please indicate the completion status of each activity, and the anticipated completion date for each activity pending completion.
14. Please provide the estimated total cost that FPUC is requesting be included in base rates for each of the listed projects. As part of this response, please provide an itemized breakdown of what is included in the cost estimate, and explain how the cost estimate was developed.
15. Please explain the process FPUC intends to use to select third party contractors for each project requiring contractor selections. For the projects that the Utility has already selected contractors for, please explain how the contractor was selected, indicate whether the selected contractor was the least cost contractor and if not, why not, and provide the reason for dismissal for all other contractors considered, if any.

16. Please provide the estimated total O&M expense associated with each of the listed projects. As part of this response, please provide an itemized breakdown of what is included in the cost estimate, and detail how third party contractors will be selected to conduct O&M activities.
17. For each of the listed projects, please identify all alternatives FPUC considered to minimize the rate impact to customers. If no alternatives were considered, please explain why for each.
18. For each of the listed projects, please explain in detail how denying each project would affect FPUC.

Please refer to MFR Schedule C-7(2025), page 1, line numbers 8 through 27 for the following questions:

19. Please provide a brief description of what is included in the costs for each of the transmission and distribution O&M categories.
20. Please detail how vendors are selected to conduct O&M activities.
21. Please provide historic O&M costs in the format of this schedule for the years 2013 through 2023 for each of the identified transmission and distribution O&M categories.

Please refer to the direct testimony of witness Haffecke for the following questions:

22. Please refer to page 12 for the following questions:

a) Please refer to lines 19 through 20. Please confirm that FPUC will be acquiring these assets from FPL. If not, please indicate where FPUC will be acquiring these assets from.

b) Please refer to lines 19 through 20. Please identify the purchase price for each acquisition, and explain how the price was determined for each.

c) Please refer to lines 22 through 23. Please detail the signs of aging FPUC has discovered. As part of this response, please detail what actions FPUC intends to take to update the aging equipment.

d) Please refer to lines 22 through 23. Please detail all customer and system benefits FPUC believes the acquisition of these assets will provide.

23. Please refer to page 13 for the following questions:

a) Please refer to lines 1 through 5. Please identify the anticipated reduction in distribution charges FPUC expects as a result of relocating the interconnection point. As part of this response, please explain how this amount was determined.

- b) Please refer to lines 12 through 13, and MFR Schedule C-7, page 7. Please confirm that FPUC is requesting that the costs associated with the addition of two IMC Technicians, one in each of FPUC's service territories, be included in base rates. As part of this response, please explain how denying this request would affect FPUC.
- c) Please refer to lines 12 through 13. Please detail why FPUC needs to add two IMC Technician positions, and identify when FPUC intends to fill each position.
- d) Please refer to lines 12 through 13. Please indicate whether or not FPUC intends for the addition of the IMC Technician positions to be permanent. If so, please explain why a permanent position is necessary.
- e) Please refer to lines 12 through 13. Please identify the anticipated salary for each IMC Technician position. As part of this response, please explain how this amount was determined, and outline the anticipated responsibilities of the position.
- f) Please refer to lines 12 through 13. Please identify the number of work hours per week expected for the IMC Technician position.
- g) Please refer to lines 12 through 13. Please explain how the responsibilities the IMC Technicians will be handling are currently addressed by FPUC. As part of this response, please explain why these responsibilities cannot continue to be addressed without the addition of this position.

- h) Please refer to lines 12 through 13. If the IMC Technician's anticipated responsibilities were previously addressed by another FPUC employee, please identify the position and remaining responsibilities of the employee, identify the current salary of the employee, and if the responsibilities of the employee will be reduced, please indicate if their salary will be decreased. If so, please identify the new salary, and if not, please explain.
- i) Please refer to lines 13 through 14. Please provide a cost breakdown of the other expenses that will be necessary for the addition of the IMC Technician position.
- j) Please refer to lines 14 through 15. Please detail the process FPUC intends to use to select outside contractors.
- k) Please refer to lines 14 through 15. Please explain if the outside contractors can complete the activities that the IMC Technician would be responsible for. If so, please explain why FPUC opted against using outside contractors for these activities.
- l) Please refer to lines 17 through 18. Please detail the signs of aging FPUC has discovered. As part of this response, please detail what actions FPUC intends to take to update the aging equipment.
- m) Please refer to lines 17 through 18. Please identify the regulations FPUC is intending to comply with.

24. Please refer to page 16, lines 14 through 17 for the following questions:
- a) Please indicate if the substation rebuild referenced here is outside of the substation rebuilds referenced on page 13, lines 17 through 18 of witness Haffecke's testimony. If so, please identify the substation, and explain why this project is necessary.
 - b) Please indicate whether these improvements will take place in FPUC's Northeast or Northwest territory.
25. Please refer to page 16, lines 20 through 21. Please provide the estimated total cost that FPUC is requesting be included in base rates for removing failing manholes. As part of this response, please explain how the cost estimate was developed.
26. Please refer to page 17, lines 10 through 15. Please identify any safety incidents that have occurred from 2018 to the present related to uninsulated live front equipment.
27. Please refer to page 19, line 21, through page 20, line 2 for the following questions:
- a) Please detail why FPUC needs to add a supervisor position in both its Northeast and Northwest territories, and identify when FPUC intends to fill each position. As part of this response, please explain how denying this request would affect FPUC.
 - b) Please indicate whether or not the addition of the supervisor position in both FPUC's Northeast and Northwest territories will be permanent. If so, please explain why a permanent position is necessary, and outline the anticipated responsibilities of the position.

- c) Please identify the anticipated salary for each supervisor position. As part of this response, please explain how this amount was determined.
- d) Please identify the number of work hours per week expected for each position.
- e) Please explain how the responsibilities the supervisor positions will be handling are currently addressed by FPUC. As part of this response, please explain why these responsibilities cannot continue to be addressed without the addition of these positions.
- f) Please identify the position and remaining responsibilities of the employee(s) currently handling the new supervisors' anticipated duties. As part of this response, please identify the current salary(ies) of the employee(s), and if the responsibilities of the employee(s) will be reduced, please indicate if their salary(ies) will be decreased. If so, please identify the new salary(ies), and if not, please explain

Please file all responses electronically no later than Tuesday, October 29, 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