

STATE OF FLORIDA

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Public Service Commission

October 18, 2024

STAFF'S EIGHTH 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:

For questions 1-6, please refer to the direct testimony of witness Napier:

1. Please explain if any Enterprise Resource Planning (ERP) costs of FPUC have been excluded in this proceeding for recovery.
2. Page 26, Lines 4-5 refers to technological enhancements Chesapeake Utilities Corporation (CUC) has implemented, the parent company of FPUC. Is CUC also benefitting from the ERP projects? If yes, how are the ERP costs allocated between CUC and FPUC?

3. Referring to page 26, lines 5-14, the witness states that implementing the Technology Cost Recovery Rider (TCRR or Rider) mechanism will help save customers additional costs of a subsequent rate case, avoid single issue rate cases, or limited proceedings. Please explain how costs will be saved by implementing the Rider as opposed to other methods stated above. Additionally, please provide estimated cost savings of implementing the proposed Rider vs. filing a rate case or a limited proceeding.
4. Please explain if the ERP is included or is a part of the (TCRR).
5. What are the customer bill impacts (for the applicable customer classes), of the proposed TCRR for 2025 through 2030?
6. Please explain why the Company proposed a January to December 12-month term to implement the proposed TCRR, as opposed to a different 12-month term.
7. Please state the Commission's jurisdiction to approve the proposed TCRR rider?
8. With reference to witness Gadgil's direct testimony, page 9, lines 1-11, please state if the new CIS billing system, based on a SAP platform, went online in August of this year. If not, when is the new billing system is expected to be operational? Also, please state what SAP stands for.

9. Referring to witness Taylor's direct testimony, page 15, lines 20-22 states that the Company has been replacing the high pressure sodium, metal halide and mercury vapor lights with LED fixtures and plans to complete the transition during the second half of 2024. Please provide an update of this transition progress as of October 2024.
10. Referring to witness Gadgil's testimony, for all the planned new technology implementation and improvements in cyber security projects, please state for each project:
 - a. Costs and expenses included in the MFRs
 - b. Costs and expenses to be included for cost recovery in the proposed TCRR rider

For questions 11 – 19, please refer to schedule E-7 in Dockets 20140025-EI and 20240099-EI:

11. Referring to Schedule E-7, page 3 of 6, please explain the decrease in the hourly transportation rate for (pickup) from \$13.50 in Schedule E-7, page 2 of 6 in FPUC's last rate case (Docket No. 20140025-EI) to \$3.98 in Schedule E-7, page 2 of 6 in Docket No. 20240099-EI.
12. Please explain the wording change from Service Labor (Docket No. 20140025-EI) to Construction labor (Docket No. 20140025-EI) when calculating the service charge for the Initial Establishment of Service.

13. Referring to Schedule E-7, page 3 of 6, please explain the wording change from Transportation (Pickup) (Docket No. 20140025-EI) to Transportation (Bucket) when calculating the service charge for the Initial Establishment of Service.
14. Referring to Schedule E-7, page 4 of 6, please explain the reasons for the increase in the amount of time (in hours) for clerical (0.16 to 0.35), service (0.50 to 0.75), and transportation (0.50 to 0.75) to re-establish service or make changes to an existing account.
15. Referring to Schedule E-7, page 5 of 6, please explain why construction and transportation will now take an extra hour along with two different transportation methods (pickup and bucket) being used for Reconnect after Disconnect for violation of rules shown in section – 13 Discontinuance of Service (After Hours).
16. Referring to Schedule E-7, page 6 of 6, please explain the need for administrative labor in the Collection Charge as the last rate case (Docket No. 20140025-EI) did not have time allotted to administrative labor.
17. Referring to Schedule E-7, page 6 of 6, please explain the increase in time allotted for clerical labor, service labor, and transportation for the Collection Charge.
18. Referring to Original Sheet No. 6.017, regarding Customer's Liabilities, would a customer be allowed to reconnect after tampering with the Company's meters?

19. Please state in which schedule the tampering penalty charges are shown. If the tampering penalty charges are not provided in Schedule E, please provide cost support for the tampering penalties for both the \$500 for residential customers and \$2,500 for non-demand general service customers' penalties.

Please file all responses electronically no later than Friday, November 1, 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