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# Public Service Commission

October 25, 2024

## STAFF'S NINTH 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](mailto: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 Florida Public Utilities Company's (FPUC or Company) Minimum Filing Requirements (MFRs), Schedule D-1a and Schedule D1-a (Supplement) for the 2025 projected test year, Column K, labeled "Interest Expense," for the following requests:
  - a) In Schedule D-1a, please explain why the total interest expense does not equal the sum of the above components in the column.
  - b) In Schedule D-1a and Schedule D1-a (Supplement), please explain why both interest expenses associated with long term debt are equal despite having different long term debt cost rates.

- c) In Schedule D-1a and Schedule D1-a (Supplement), please provide the interest calculations under Column K for long term debt, short term debt, customer deposits, and the total interest expense.
2. Please refer to Direct Testimony of FPUC witness Michelle Napier, page 18, lines 3 through 9, for the following requests:
    - a) Please provide a citation for where the interest and income tax synchronization adjustment and its calculation can be found within the MFRs and electronic MFRs.
    - b) Please provide a step-by-step breakdown of the calculation used to achieve the \$5,950 interest synchronization adjustment.
  3. Please provide details on the estimated additional project cost of \$587,280 for the General Ledger System CWIP that can be found on MFR Schedule B-13, page 2 of 2.

Please file all responses electronically no later than Friday, November 8, 2024, through the Commission's website at [www.floridapsc.com](http://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](mailto: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