

STATE OF FLORIDA

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# Public Service Commission

November 7, 2024

## STAFF'S THIRTEENTH 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:

### Trend Factor Issue (Issue 4)

1. Please refer to the direct testimony of witness Michelle Napier, page 20, lines 4-19.  
Please provide a definition of the CPI used by the utility to determine its (non-payroll) inflation trend factor. Address in your response what inputs are incorporated to arrive at average CPI.
2. Please refer to the direct testimony of witness Michelle Napier, page 20, lines 4-19.  
Please identify what date(s) and source(s) of CPI was(were) used to develop the 2024 and 2025 values shown on MFR Schedule C-33, Performance Indices.

3. Using the source specified in the response to question 2 on the previous page, provide the most recent forecast of average CPI for 2024 and 2025 and the date of the data source relied upon to calculate it.
4. Please refer to the direct testimony of witness Michelle Napier, page 20, lines 15-16.
  - a) Please describe how FPUC determined that the proposed inflation trend factor, based on average CPI, is the “most appropriate” trend factor to use in this proceeding.
  - b) Discuss whether FPUC considered other sources for an inflation trend factor, including, but not limited to, the PCE (Personal Consumption Expenditures Price Index). Address in your response how the utility evaluated the reasonableness of the average CPI it used against other sources.

Miscellaneous Service Revenue (Issue 27)

5. Please refer MFR Schedule E-13b (for the Projected Test Year ended 12/31/25), to answer the following questions:
  - a) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 289 service charge transactions for Type 1 service charges (Initial Establishment of Service). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.

- b) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 3,619 service charge transactions for Type 2 service charges (Re-established Service or Make Changes to Existing Account). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- c) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 304 service charge transactions for Type 3 service charges (Temporary Disconnect then Reconnect Service Due To Customer Request). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- d) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 245 service charge transactions for Type 4 service charges (Reconnect after Disconnect for Rule Violation in normal hours). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- e) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 6 service charge transactions for Type 5 service charges (Reconnect after Disconnect for Rule Violation after hours). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.

- f) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 1,973 service charge transactions for Type 6 service charges (Collection Charge). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- g) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 0 service charge transactions for Type 7 service charges (Temporary Service). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- h) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 1,179 service charge transactions for Type 8 service charges (Returned Check Charge). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.
- i) MFR Schedule E-13b (Page 1 of 1) for the Projected Test Year Ended 12/31/2025 reflects that the utility is projecting 1,437 service charge transactions for Type 9 service charges (Miscellaneous Allowance and Adjustments). Please state the number of transactions that were recorded for this metric in each of the years between 2020 – 2023 (actuals), and the number estimated for 2024.

6. Please refer MFR Schedule C-5 for the Prior Year Ended 12/21/24 (Line 19), which reflects that the Jurisdictional Miscellaneous Service Revenue for that period was \$162,665. Please demonstrate the calculation of this amount.
7. Please refer MFR Schedule C-5 for the Historical Prior Year Ended 12/21/23 (Line 19), which reflects that the Jurisdictional Miscellaneous Service Revenue for that period was \$213,028. Please demonstrate the calculation of this amount.

Conservation Clause Removal (Issue 31)

8. Please refer MFR Schedule C-2 (for the Projected Test Year ended 12/31/25), and explain how FPUC determined the Conservation Revenue adjustment of (\$883,887) presented in Column 2.
9. Please refer MFR Schedule C-2 (for the Projected Test Year ended 12/31/25), and describe the "Other" Operating Expense of (\$883,138) presented in Column 2. Include in your response how FPUC determined the adjustment amount (\$883,138).

Staff's Thirteenth Data Request

November 7, 2024

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Please file all responses electronically no later than Thursday, November 21, 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