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Public Service Commission

December 20, 2024

STAFF'S TWENTY THIRD 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. In response to staff's tenth data request, FPUC indicated it is still testing out the range of its proposed radio system. Please explain how the radio system will adequately cover FPUC's service territory. As part of your response, please explain what alternative communication systems were evaluated, if any.
2. On MFR Schedule B-13, page 4 of 87, FPUC budgeted \$800,000 for the cost of the radio system. However, on page 15 and 16, line 10 of witness Haffecke's testimony, the cost of the radio system is \$1.3M. Please identify the total cost of the radio system and provide an itemized breakdown of what is included in the total cost.

3. Please refer to witness Haffecke's testimony, page 16, lines 6 through 8 and MFR Schedule B-13, page 4 of 87, Radio system (line 33). For purposes of clarity, please explain if both project names used are associated with one project. If not, please explain the difference.

4. Please refer to the direct testimony of witness Napier testimony page 22, lines 14 through 18. Please provide the estimated storm reserve charge per 1,000 kWh with FPUC's requested storm accrual increase of \$446,979.

Please file all responses electronically no later than Friday, January 3, 2025, 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