

45

**FPUC's response to staff's sixth set of
interrogatories No. 51-52**

INTERROGATORIES

51. Is FPUC aware if any other Florida Investor-Owned Electric Utility -- Duke Energy Florida, Florida Power & Light, or Tampa Electric Company -- intends to recover the cost of any of its Storm Protection Plan programs in 2023 through a demand charge for demand-metered customers?

Company Response:

Initially, FPUC was unaware of how other utilities were charging demand-metered customers. However, upon review of Wal Mart's testimony in this proceeding, and responding to Commission staff interrogatories, it has become apparent that other Florida IOUs apparently intend to recover cost of its Storm Protection Plan programs in 2023 through a demand charge for demand-metered customers.

Respondent: Michelle Napier

52. Please explain why FPUC believes it is appropriate to recover the cost of its Storm Protection Plan program in 2023 from demand-metered customers through an energy charge.

Company Response:

FPUC believes it is appropriate to recover the costs of its Storm Protection Plan program in 2023 from demand-metered customers through an energy charge because the Company currently recovers clause costs to demand-metered customers through an energy charge, specifically its fuel clause.

Respondent: Michelle Napier

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery) Docket No. 20220010-EI
Clause)
)
)
) Filed: October 12, 2022
_____)

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S SIXTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 51-52 in Docket No. 20220010-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

Michelle Napier

Michelle Napier, Declarant

Dated: October 12, 2022