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FPUC's Response to Staff's First Set of Interrogatories Nos. 1-2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan
pursuant to Rule 25-6.030, F.A.C., Florida
Public Utilities Company

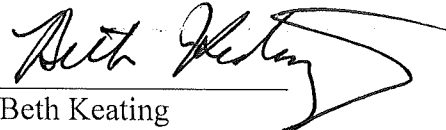
DOCKET NO. 20220049-EI

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**FLORIDA PUBLIC UTILITIES COMPANY'S
RESPONSES TO COMMISSION STAFF'S
FIRST SET OF INTERROGATORIES (NOS. 1-2)**

Florida Public Utilities Company ("FPUC" or "Company"), hereby submits its Responses to the First Set of Interrogatories (Nos. 1-2) served on the Company on May 6, 2022, by the Staff of the Florida Public Service Commission. The individual responses follow this cover sheet.

Respectfully submitted,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706
*Attorneys for Florida Public Utilities
Company*

Interrogatory No. 1

INTERROGATORIES

1. Please refer to Witness Cutshaw's direct testimony filed on April 11, 2022, page 6, lines 16 through 22. Please explain the differences between the components of FPUC's Storm Hardening Plan and the enhancements in its Storm Protection Plan.

Response: The SPP, as presented, includes the Overhead Feeder Hardening, Overhead Lateral Hardening, Overhead Lateral Undergrounding, Transmission and Substation Resiliency and Future Transmission and Distribution Enhancements programs which are solely within the SPP and not currently being recovered through base rates.

The Distribution Pole Inspection and Replacements and the Transmission System Inspection and Replacement programs are currently in the Storm Hardening Plan and recovery is through base rates. The enhancements within the Distribution Pole Inspection and Replacements program will allow the backlog of distribution pole replacements to be addressed over the 2023 – 2027 time period. The enhancements within the Transmission System Inspection and Replacements program will allow the replacements of wood transmission poles with concrete poles to be increased during the 2027 – 2031 time period. However, due to the enhancements, the recovery in base rates does not adequately cover the proposed enhanced activities that are necessary to cover the programs that provide for the reliability and resiliency as contemplated in the SPP. Additional recovery will be necessary to ensure the work is performed as proposed.

The Vegetation Management program has also been included in the Storm Hardening Plan and recovery is made through base rates. With the enhanced Vegetation Management program, as proposed, the trim cycle proposal will change from a three year feeder and six year lateral schedule

Interrogatory No. 1, cont.

to an overall four year schedule. As included in the SPP the enhancement will increase the efficiency and level of vegetation management performed above the recovery amount included in base rates. Please see OPC's 4th Set of Interrogatories, Item #37 for additional information regarding this program.

Respondent: Mark Cutshaw

Interrogatory No. 2

2. Please fill out the following table with the operation and maintenance (O&M) and capital amounts of the revenue requirements for each of the respective SPP programs.

Respondent: Mark Cutshaw

	Actual		Estimated										
	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
Capital													N/A
Overhead Feeder Hardening			289,424	2,922,947	2,976,875	1,283,655	2,492,174	1,469,104	1,464,383	1,421,901	1,425,199	1,309,390	
Overhead Lateral Hardening			56,013	560,128	975,253	4,406,826	1,797,906	2,986,542	3,172,281	4,711,865	3,461,883	2,618,781	
Overhead Later Undergrounding			108,910	1,089,102	1,620,936	6,227,515	4,999,799	8,524,189	8,063,369	6,443,116	13,134,267	13,134,267	
Distribution Pole Inspection and Replacements													
Transmission System Inspection and Replacement	N/A	N/A	1,069,875	1,332,728	1,420,346	1,507,963	1,595,581	1,430,860	1,069,875	1,069,875	1,069,875	1,069,875	
Transmission and Substation Resiliency													
Future Transmission and Distribution Enhancements					9,069,500	38,499,300	38,499,300						
Transmission and Distribution Vegetation Management						1,500,000	3,000,000	4,500,000	4,800,000	5,100,000	5,100,000	6,000,000	

[illegible]