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FPUC's Response to OPC's First
Production of Documents Nos. 1-2

(Nos. 1 and 2 have attachments)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Tampa Electric Company	DOCKET NO. 20220048-EI
In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company	DOCKET NO. 20220049-EI
In re: Review of Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Duke Energy Florida, LLC	DOCKET NO. 20220050-EI
In re: Review of Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Power & Light Company	DOCKET NO. 20220051-EI
	DATED: April 12, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S
RESPONSES TO CITIZEN'S
FIRST REQUESTS FOR PRODUCTION (NOS. 1-2) TO COMPANY**

Florida Public Utilities Company ("FPUC" or "Company"), hereby submits its Responses to the First Requests for Production (Nos. 1-2) served on the Company on March 22, 2022, by the Office of Public Counsel. The individual response follows this cover sheet.

Respectfully submitted,



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DOCUMENT REQUESTS

1. Please provide all analyses and source documents prepared in support of the Company's application, testimony, and expert reports in this proceeding before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.

Response: FPUC is providing the following documents responsive to this request:

Appendix A (Excel)

First Table Information (Excel)

Estimated Storm Protection Cost Recovery Rate (Excel)

SPP Customer Bill Impact Comparison (Excel)

138 KV Transmission Line Alt 1A : (PDF)

Combined Outage data (Excel)

Apalachicola River Crossing Pole List (Excel)

FPUC Model and Targets Document (Excel): Output from the Pike Resiliency Risk Model.

The Resiliency Risk Model itself is proprietary software owned by Pike. As such, the model is not being provided. However, access can be obtained on site at the Pike Office located at 4427 Pet Lane, Suite 101, Lutz, FL 33559.

FPUC NE Shape Files: (zip)

FPUC NW Shape Files: (zip)

NE OH-UG (PDF)

NW OH-UG Pole line Miles (PDF)

FPUC OMS Data

2. Please provide all analyses and underlying support for all schedules, exhibits, tables, and graphs included in and/or attached to the Company's testimonies and expert reports in this proceeding prepared before or contemporaneous with its filing, including all Excel workbooks in live format with all formulas intact in searchable and unlocked format.

Response:

Appendix A

Estimated Storm Protection Cost Recovery Rate

SPP Customer Bill Impact Comparison

138 KV Transmission Line Alt 1A