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**FPUC's Responses to Staff's Amended  
Ninth Set of Interrogatories, No. 86**

## Interrogatory No. 86

86. Please refer to FPUC's revised response to Staff's Second Set of POD's, No. 10, Excel file titled "Copy of Revised Staff POD 02-10 Attachment-1 (9-7-2022)", under the "UPC" tab. Please explain why FPUC projects a zero percent or negative growth rate for 2022 and 2023 for the following customer classes, despite the classes averaging a positive growth rate over the past 5 years.

## a. Indiantown - Transportation Service 3 - (line 9)

| <b>Indiantown - Transportation Service 3</b> | 2017 | 2018 | 2019 | 2020 | 2021 | 2017-2021 Average | 2022 Forecasted | 2023 Forecasted |
|--|------|------|------|------|------|-------------------|-----------------|-----------------|
| UPC Growth (Y/O/Y)                           | 17%  | 52%  | 1%   | 21%  | 71%  | 32%               | 0%              | 0%              |

## b. FPUC - Natural Gas Vehicle Transportation Service (line 31)

| <b>FPUC - Natural Gas Vehicle Transportation Service</b> | 2017 | 2018 | 2019 | 2020 | 2021 | 2017-2021 Average | 2022 Forecasted | 2023 Forecasted |
|--|------|------|------|------|------|-------------------|-----------------|-----------------|
| UPC Growth (Y/O/Y)                                       | 241% | 58%  | 14%  | 29%  | 16%  | 71%               | -16%            | 0%              |

## c. CFG - Firm Transportation Service - B (Fixed Non-Residential) (line 41)

| <b>CFG - Firm Transportation Service - B (Fixed Non-Residential)</b> | 2017 | 2018 | 2019 | 2020 | 2021 | 2017-2021 Average | 2022 Forecasted | 2023 Forecasted |
|--|------|------|------|------|------|-------------------|-----------------|-----------------|
| UPC Growth (Y/O/Y)   | 25%  | 9%   | 9%   | 5%   | 5%   | 11%               | -3%             | -3%             |

**Company Response:**

Please refer to the Company's supplemental response to POD 2-10 Attachment 1. The revised data presents new five-year average results as follows:

a. Indiantown - Transportation Service 3 - (line 9)

| <b>Indiantown -<br/>Transportation<br/>Service 3</b> | 2017 | 2018 | 2019 | 2020 | 2021 | 2017-<br>2021<br>Average | 2022<br>Forecasted | 2023<br>Forecasted |
|--|------|------|------|------|------|--------------------------|--------------------|--------------------|
| UPC Growth<br>(Y/O/Y)                                | 4%   | 71%  | 1%   | 21%  | 71%  | 32%                      | 0%                 | 0%                 |

There is only one customer receiving services under Indiantown – Transportation Service 3. For forecasting purposes, the historical actual data was used for this customer class as no known and measurable changes were anticipated.

b. FPUC - Natural Gas Vehicle Transportation Service (line 31)

| <b>FPUC - Natural<br/>Gas Vehicle<br/>Transportation<br/>Service</b> | 2017 | 2018 | 2019 | 2020 | 2021 | 2017-<br>2021<br>Average | 2022<br>Forecasted | 2023<br>Forecasted |
|--|------|------|------|------|------|--------------------------|--------------------|--------------------|
| UPC Growth<br>(Y/O/Y)  | 0%   | 0%   | 14%  | 29%  | 16%  | 12%                      | -16%               | 0%                 |

There are three customers receiving services under FPUC - Natural Gas Vehicle Transportation Service. Due to historical data variations, the historical three-year average actual data was used for forecasting purposes as no known and measurable changes were anticipated for this customer class.

c. CFG - Firm Transportation Service - B (Fixed Non-Residential) (line 41)

| <b>CFG - Firm<br/>Transportation<br/>Service - B<br/>(Fixed Non-<br/>Residential)</b> | 2017  | 2018 | 2019 | 2020 | 2021 | 2017-<br>2021<br>Average | 2022<br>Forecasted | 2023<br>Forecasted |
|---|-------|------|------|------|------|--------------------------|--------------------|--------------------|
| UPC Growth<br>(Y/O/Y)   | 7541% | -98% | 19%  | 5%   | 5%   | 1494%                    | -3%                | -3%                |

There is only one customer receiving services under CFG - Firm Transportation Service - B (Fixed Non-Residential) with very low gas consumption. Additionally, this rate schedule is closed to all new customers. For forecasting purposes, this class was grouped with other similar classes.

The regression analysis generated various result points ranging from 6.74% to (5.40%). A median point between average and low was selected for forecasting purposes. Please refer to the Company's response to OPC POD 21 "WP-JDT\_Pro-Forma Rev and Other", specifically worksheet "WP\_Regression Summary" for a summary of the regression results and Staff POD 2-3 for the process details.

***Respondent: John Taylor***

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

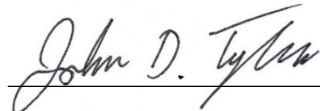
|   |                           |
|---|---------------------------|
| In re: Petition for rate increase by Florida  | ) Docket No. 20220067-GU  |
| Public Utilities Company, Florida Division of | )                         |
| Chesapeake Utilities Corporation, Florida     | )                         |
| Public Utilities Company - Fort Meade, and    | )                         |
| Florida Public Utilities Company - Indiantown | ) Filed: October 10, 2022 |
| Division.                                     |                           |

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**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S AMENDED NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, (Numbers 85-87, 89, 99-104) in Docket No. 20220067-GU. 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.



John Taylor

Dated: September 27, 2022