

**82**

**FPUC's Responses to Staff's Amended  
Ninth Set of Interrogatories, Nos. 90-110**

**(Including Attachments)**

Interrogatory No. 90

90. Witness Lake's direct testimony, Page 7, line 7 states that the Company currently has 49 active AEP projects. Please provide a breakdown of these 49 AEP project locations by municipality and county.

**Company Response:**

Please refer to the attached file "Staff ROG 90 - AEP Summary.xlsx".

***Respondent: Kira Lake***

Interrogatory No. 91

91. With reference to Witness Lake's direct testimony, Page 9, lines 17-19, please explain the statement "the Company believes could reduce or mitigate the potential for issues around customer usage..." as it relates to an optimal minimum use agreement intended for non-residential customers.

**Company Response:**

In the statement referred to on page 9, line 17-19 as described above, the Company is referring to the extension of its facilities in accordance with Rule 25-7.054 of the Florida Administrative Code, which requires that extensions be made at no cost to the customer when the capital investment necessary to extend the Company's facilities to provide service is equal to or less than the Maximum Allowable Construction Cost ("MACC"). In instances, however, where the required investment cost exceeds the MACC, the customer is required to pay an advance, or Contribution in Aid of Construction ("CIAC"), for the difference. In either case, there are times when the actual revenue obtained through service to the customer varies from what was initially estimated during the MACC calculation, which does not allow the Company to recoup its initial capital investment within a reasonable amount of time. An optional minimum use agreement would mitigate issues around the estimated usage used in the MACC calculation by allowing the Company to recoup its capital investment to extend service to customers even when that customer's actual usage falls short of the usage projected.

***Respondent: Kira Lake***

Interrogatory No. 92

92. Witness Cassel in his direct testimony, refers to establishing an environmental surcharge mechanism for environmental remediation work related to manufactured gas plants. Please discuss the proposed surcharge with details and how it will be allocated across customer classes. Also discuss the time period this surcharge would be effective.

**Company Response:**

The Company objects that the phrase “discuss the proposed surcharge with details” is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request.

Please refer to the attached file titled “Staff ROG 92-Environmental Surcharge Calculation.xls” for the calculations and charges for the environmental surcharge. The Company used the median estimate of Michelle Ruth and Associates costs which were based on a 10-year remediation. We added an estimate for other costs for items such as electric, maintenance of the property, water and security. Please refer to the “Cost Estimate” tab. The total costs were reduced by the liabilities established to cover the costs on the tab titled “Summary”. The remaining amount was divided by 10 years to arrive at the annual surcharge amount of \$627,995. As shown on the “Surcharge Calculation” tab, this amount was divided by the projected annual revenues of \$101,777,920 to determine a percentage, 0.62%, to use for calculating the monthly fixed surcharge for each class. The Company multiplied this percentage by the projected revenues for each customer class and then divided this by the total projected bills for each class to determine a per

bill charge. The Company estimates that this surcharge would be in effect for the duration of the remediation efforts, which is currently estimated to be 10 years unless we determine that the remediation costs or length of time will change, at which time we would file a request for a rate change.

***Respondent: Michelle Napier***

Interrogatory No. 93

93. Witnesses Cassel and Grimard in their direct testimony, refer to manufactured gas plants. Please explain how the Company handles the decommissioning of a manufactured gas plant site.

**Company Response:**

Below are the general steps taken when decommissioning Manufactured Gas Plants (MGPs):

1) Demolition: removing all above-ground and below-ground structures (e.g. buildings and gas-manufacturing operational units such as gas holders) to provide access to the subsurface and identify any source areas of contamination. Above-ground structures are surveyed for hazardous materials such as asbestos and lead, and then bids are obtained to select the most competitive and qualified demolition contractor(s). All requisite permitting for the structure removal is obtained from the relevant jurisdiction(s). The above-ground structures are dismantled and the demolished material is recycled to the extent possible, including but not limited to concrete and copper. Non-recyclable materials are removed and properly disposed of in licensed landfills or incinerated, if possible and cost-effective. Below-ground features such as foundations and underground gas holders and piping are excavated and recycled to the extent possible, including concrete and steel. Other materials are disposed of in permitted landfills.

2) Interim remediation: the excavation of MGP impacted soils. Deposits of coal tar in subsurface tanks, holders or pipes are stabilized and disposed of via incineration or landfilling. Near-surface soils that are heavily contaminated with coal tar or other gas-manufacturing byproducts or wastes are also excavated and disposed of properly.

3) Investigation: investigate the presence and nature of contaminants, such as dense non-aqueous phase liquid (DNAPL) and light non-aqueous phase liquid (LNAPL)

4) Remediation: removal of contaminants using air sparging and soil vapor extraction systems. Contaminants are removed and disposed of in compliance with prescribed regulations. All excavations are backfilled with clean structural fill.

5) Groundwater Monitoring: long term monitoring of the subsurface until measurements meet applicable required standards

6) Closure: receipt of state issued certification of completion of remediation and covenant of future land use. The ground surface is then covered with finish material, such as gravel or asphalt.

***Respondent: Jason Bennett***

Interrogatory No. 94

94. Witness Cassel's direct testimony, Page 10, lines 12-13 states that FPUC is "requesting certain changes to the Company's Area Expansion Program ("AEP") that will reduce customer confusion and produce administrative efficiencies". Please discuss how the proposed changes would result in less customer confusion and produce administrative efficiencies.

**Company Response:**

The requested changes to the Company's Area Expansion Program (AEP) will reduce customer confusion and produce administrative efficiencies through the following:

1. The Recalculated AEP surcharge will be eliminated. The AEP rate is billed to customers each month and any change in this rate could result in increased calls to the Company regarding the change in rate and its calculation. The elimination of the recalculated AEP rate would also remove the administrative work needed to recalculate the AEP rate for each project.

2. The amortization period will apply individually to each premise for a set period of seventy-two (72) billing months. This gives each customer an expectation of exactly when the AEP rate will be charged and for how long. Under the Company's current AEP program, a customer could be charged an AEP rate for up to 10 years depending on when the Company's investment was recovered. This varies from project to project and often leads to confusion between customers in neighboring communities with different AEP rates and recovery timelines.

***Respondent: Kira Lake***



Interrogatory No. 95

95. On Page 28 of Witness Cassel's direct testimony, lines 3-8 refers to environmental remediation costs related to manufactured gas plants. Please list the other types and approximate Dollar amounts of environmental remediation costs, if any, the Company incurs on an annual basis.

**Company Response:**

Please refer to file "Staff ROG 92-Environmental Surcharge Calculation.xls" provided in response to interrogatory 92. The "Cost Estimate" tab, lines 23-35 are the other annual costs the Company incurs.

***Respondent: Michael Cassel***

Interrogatory No. 96

96. Witness Grimard's direct testimony, Page 8, line 5 refers to the AEP surcharge in Tariff Sheet No. 7.303. Please state why the telemetry maintenance charge is not applicable to Fort Meade and FPUC service area customers.

**Company Response:**

Withdrawn by Staff.

***Respondent: Wraye Grimard***

Interrogatory No. 97

97. Please refer to Witness Grimard's direct testimony, Page 9, line 20 for the following interrogatories.

a. Approximately how many customers are currently required by the Company to have electronic metering equipment? Please explain.

b. Approximately how many customers will be required to install electronic metering equipment? Please also include the percentage of customers.

c. Please explain how long the Company expects to take to install the required electronic metering equipment for its current customers.

d. Tariff Sheet Nos. 6.025, 6.026, and 6.028 state that Commercial and Industrial customers whose daily consumption of Gas exceeds 1,500 Therms; all Interruptible customers; and customers receiving transportation service whose annual consumption of Gas exceed 50,000 Therms; shall have electronic metering equipment installed by the Company at the customer's expense. Please explain the cost to Commercial, Industrial, Interruptible, and Transportation customers to install the electronic meter equipment.

**Company Response:**

The Company objects that this question assumes facts not established, by assuming that telemetry equipment will be installed based on testimony that FPUC is requesting tariff language to require telemetry installation in some situations.

a. The Company objects that "Please explain" is vague in that the predicate requests a specific number so it is unknown what requires explanation. FPUC has made a

good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request.

CFG –All existing CFG customers with the exception of approximately twenty four (24) small residential and commercial customers (to whom the tariff language does not apply) are required to and have telemetry.

Indiantown – No existing customers currently are required to have telemetry.

Ft. Meade – No existing customers currently are required to have telemetry.

FPUC – There are approximately 88 customers who have and are required to have and have telemetry.

b. There are no existing customers that would be required to have telemetry installed who otherwise do not have telemetry in place at this time. The tariff requirements do not impact any existing customers.

c. The Company does not expect to install additional telemetry units at any existing customer facilities.

d. The cost for a remote telemetry unit and its installation ranges from \$3,000 to \$4,000.

***Respondent: Wraye Grimard***

Interrogatory No. 98

98. Referring to Witness Grimard's direct testimony, Page 12, line 7, please explain how the Company currently calculates the security requirement for pool managers.

**Company Response:**

The Company reviews and calculates a pool manager's security requirements based on the Company's financial exposure should pool managers default on i) cashout invoices issued by the Company, ii) penalty invoices issued by the Company, iii) ancillary charge invoices associated with being a pool manager on the Company's distribution system issue by the Company and iv) default by the Pool Manager for failure to pay the upstream pipeline for interstate capacity expenses associated with capacity releases from the Company to the associated pool manager. The expenses calculated by the Company are summed to determine the aggregate Company exposure and the pool manager's security requirement.

***Respondent: Wraye Grimard***

Interrogatory No. 99

99. The 54 current rate classes are being grouped into 16 rate classes, as stated in Witness Taylor's testimony, Page 12, lines 13-15. Please discuss all the factors that were considered when determining the proposed new rate classes.

**Company Response:**

The Company objects that the phrase "discuss all the factors" is vague and, if given its broadest interpretation would be potentially burdensome. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such requests and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request.

Please refer to Mr. Taylor's direct testimony on page 18, lines 4-14. As stated in the testimony a detailed analysis of the customers' premises and related annual consumption of therms was conducted based on the historical year 2021. The primary homogeneous characteristics to transition customers from existing classes to new ones were customer type and annual consumption. Other factors such as tariff schedule simplicity and transparency, customer transition and impact, current service structure, and gas usage applicability levels were considered in the analysis while developing the proposed consolidated structure.

Please refer to the attachment to OPC's Production of Documents number 21 titled "Confidential OPC POD 21 WP-JDT\_Customer Transition.xlsx" for details of the customer transition analysis.

***Respondent: John Taylor***

Interrogatory No. 100

100. Referring to Witness Taylor's direct testimony, please provide the total projected 2023 cost of service for each business unit of the Company, as well as the proposed total base rate revenues for each business unit.

**Company Response:**

Please refer to Staff ROG 100-Attachment.xlsx for the projected 2023 cost of service for each business unit and proposed base rate revenues.

***Respondent: John Taylor***

INTERROGATORIES

Interrogatory No. 101

101. Witness Taylor's direct testimony, Page 14, lines 5-7 states that GS-2, GS-3, GS-4, Commercial interruptible, Commercial-NGV, and Outdoor Lighting are being charged rates that recover less than their indicated cost of service presently. How is FPUC proposing to equalize/balance this situation?

**Company Response:**

As described on page 14 and 16 of Witness Taylor's direct testimony there are various rate design principles considered when setting revenue targets by class that can conflict with each other, one of these is the cost of service. The Company has as a goal over time to move classes closer to their cost of service while considering other rate design principles. At this time there is no explicit proposal to set each class to their cost to serve.

***Respondent: John Taylor***



Interrogatory No. 102

102. Referring to Witness Taylor's direct testimony, Page 20, lines 9-11, please discuss if the Ft. Meade and Indiantown customers are being subsidized by the FPUC and Chesapeake customers, given that the Company has proposed a lower revenue increase for Ft. Meade and Indiantown.

**Company Response:**

Ft. Meade and Indiantown divisions provide services to about one percent of the Company's total customers (mostly residential) and less than one percent of the total cost to serve.

The proposal is to set rates lower for Ft. Meade and Indiantown customers on equivalent rates as FPUC and CFG customers which results in a lower average increase for these business units. The proposed revenue apportionment creates some cross-subsidizations that minimally impact customers served in other territories. Please refer to the Staff's ROG 9-100 for the cost to serve each business unit and the related proposed revenue apportionment. As stated on Witness Taylor's direct testimony, Page 20, lines 11-13, this proposal was made to safeguard these customers from significant increases resulting from the consolidation of rates across all four divisions.

***Respondent: John Taylor***

Interrogatory No. 103

103. Witness Taylor's direct testimony, Page 24, lines 5-6 states that "the Company developed a new block rate structure for its largest industrial customers..." Please provide a discussion on the new block rate structure for large industrial customers.

**Company Response:**

The Company objects that the phrase "a discussion on the new block rate structure" is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. As stated on Witness Taylor's direct testimony, Page 24, line 23 and Page 24 line 1, "Block volumetric charges were introduced for General Service-8 to mitigate bill impacts on the Company's largest customers." The following is a block rate structure for General Service-8 with associated annual usage applicability:

- General Service - 8A - 1,000,000 through 1,499,999 Therms. Tariff sheet No. 7.138.
- General Service - 8B - 1,500,000 through 1,999,999 Therms. Tariff sheet No. 7.141
- General Service - 8C - 2,000,000 through 3,999,999 Therms. Tariff sheet No. 7.145
- General Service - 8D - 4,000,000 Therms and up. Tariff sheet No. 7.149

Please refer to Exhibit JDT-4 to Mr. Taylor's direct testimony for the customer information transitioning to the relative blocks.

***Respondent: John Taylor***

Interrogatory No. 104

104. Referring to Witness Taylor's direct testimony, Page 24, line 14, Witness Taylor states that the Company is proposing revenues for RS-3 close to its indicated cost of service, which, as a result, ensures that new customers contribute their cost to serve and are not subsidized by other rate classes. Given that the Company has proposed for the smallest residential customers to remain below their cost to serve, is there the potential that new residential customers could subsidize the cost to serve current customers in RS-1 and RS-2? Please explain.

**Company Response:**

Please refer to Table 2 and Table 5 of Witness Taylor's direct testimony. These tables demonstrate the cost to serve and proposed revenue increases by customer class. In instances where customer classes are paying their cost to serve, they are not subsidized by other customer classes nor subsidizing other customer classes. In instances where customer classes are paying higher than their cost to serve, they are subsidizing those customer classes that are paying below their cost to serve. The cost to serve the RS-3 class is discussed in Witness Taylor's direct testimony, Page 24, line 16-17, "...the COSS shows a total revenue requirement of \$14,351,536 (see MFR Schedule H-1 Schedule D), and the proposed revenues from this class are \$14,636,336 (see Table 4 above)." Given the RS-1 and RS-2 customer classes' proposed revenues are below their cost to serve they are subsidized by those customer classes whose proposed revenues are set above their cost to serve , which are primarily larger customer classes.

***Respondent: John Taylor***

Interrogatory No. 105

105. Please refer to Tariff Sheet No. 6.175 for the following interrogatories.

a. Please explain the impact to customers, if any, in the event the customer's electric utility fails to provide electric service to the remote reading device location, though no fault of the participant.

b. Please explain the impact to customers, if any, in the event the customer's telephone service provider fails to provide telephone service to the remote reading device location, though no fault of the participant.

**Company Response:**

a. In the event of an electric outage the remote telemetry units have battery backup and the measurement data is stored until the electric service is restored. In the case of a prolonged outage, the Company would use the actual meter readings as a back-up for missing electronic data, if any.

b. The Company uses cellular telephone service to communicate with its RTUs and an extended service outage would be remote. However, in the event of a telephone outage the remote telemetry units have battery backup and the measurement data is stored until the telephone service is restored. In the case of a prolonged outage, the Company would use the actual meter readings as a back-up for missing electronic data, if any.

***Respondent: Wraye Grimard***

Interrogatory No. 106

106. As summarized in OPC witness Smith's testimony, in response to OPC ROG 54, the Company identified \$35,366 in lobbying expenses related to industry associations that were inadvertently included in the cost of service for FPUC. In subpart f of that same response, it provided an Excel schedule of three line items included in advertising expense.

a. The first line item is labeled "Employee Communication, Customer Care Communication, Damage Prevention, Community Relations and Natural Gas Advocacy" and includes a single expense amount for all of these activities from 2020 Actual to 2023 Projected. Please separately identify how much of the expense is related to "Natural Gas Advocacy" and "Community Relations" in each of the years

b. Please provide a detailed description of the expenditures that constitute "Community Relations" and explain how they are not image enhancing.

c. Please provide a detailed description of the expenditures that constitute "Natural Gas Advocacy."

d. On pages 48-51 of FPUC witness Cassel's testimony, he broadly describes "Natural Gas Advocacy," and acknowledges that it falls under expenses related to "advocacy and lobbying-type activity" that have a well-documented history of being disallowed by the Commission. Why were the expenses associated with "Natural Gas Advocacy" not reported as lobbying expenses, instead of advertising?

e. The third line item in the schedule is labeled "Community Engagement." Please explain how this category of advertising expense is not image enhancing.

**Company Response:**

a. The following detail shows the expense for Natural Gas Advocacy and Community Relations from 2020 actual to 2023 projected.

	2020 Actual	2021 Actual	2022 Actual (Jan-Apr)	2022 Projected	2023 Projected
Natural Gas Advocacy	\$3,033.75	\$0	\$0	\$0	\$0
Community Relations	\$2,135.71	\$2,088.28	\$142.40	\$2,263.70	\$2,394.84

b. The Company objects that the phrase “detailed description” is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. Expenses included in the “Community Relations” category above include costs associated with events and other community initiatives to support safety and health, education, environmental stewardship and community development. These expenses are not image enhancing. They create shared value for FPUC and its customers by providing opportunities for community engagement and customer communication. Donations are typically not included in the “advertising” category; however, two donations to schools, one for \$650 in 2020 and one for \$650 in 2021 were included in error.

c. The Company objects that the phrase “detailed description” is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. Expenses included in the “Natural Gas Advocacy” category above include advertisements, digital and print material that promote the role that affordable, efficient Natural Gas plays in driving economic development in communities and throughout the state of Florida. These messages highlight how Natural Gas attracts industrial facilities to Florida, creates

employment and greater societal advancement often introduces Compressed Natural Gas as a transportation fuel.

d. The Company objects that the phrase “Why were the expenses associated with ‘Natural Gas Advocacy’ not reported as lobbying expenses, instead of advertising” is vague because it is unclear how expenses “not reported” as lobbying could be reported as advertising “instead”. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. The Natural Gas advocacy expenses above were not reported as “lobbying” because they are not lobbying expenses. The lobbying expenses are incurred as a direct result of the Company’s participation in the legislative process, efforts to influence a bill moving through the legislative process, or to otherwise seek changes through that process to the existing statutory framework. In contrast, the advocacy expenses result from the Company’s efforts to actively engage all stakeholders, not just legislators, regarding the greater societal benefits of natural gas for the state and our customers. This advocacy takes place at the state and local level and is focused on ensuring that stakeholders understand all benefits of natural gas, including societal, cost, and environmental benefits, and that external efforts to influence stakeholders to the contrary or to otherwise limit access to and use of natural gas do not take hold. Our advocacy in this regard ensures that our customers can continue to use and enjoy natural gas service, which provides them with fuel options, and helps ensure that new customers and businesses coming to Florida are able to utilize this clean, efficient resource.

e. The Company’s Community Engagement expenses are not image enhancing. These expenses are primarily incurred for sponsorships with community partners where the Company receives an opportunity to advertise natural gas and its benefits to potential customers in its service

territories. These advertisements are usually print, outdoor or digital advertising, but may include booth space or other opportunities for community engagement. This category of expense also includes the Company's "Natural Gas is Key" campaign to educate the community on how essential natural gas is for homes, businesses, the economy and the future. The expenses support the use of natural gas generally and do not promote FPUC as a source of natural gas.

***Respondent: Kira Lake and Michael Cassel***



Interrogatory No. 107

107. Please refer to MFR Schedule G-2, page 29 of 31, line 5. Please provide the calculation for the parent debt adjustment pursuant to Rule 25-14.004, Florida Administrative Code, Effect of Parent Debt Adjustment of Federal Corporate Income Tax.

**Company Response:**

There is no parent debt adjustment required under the rule because FPUC does not have any debt on its own. As only a single level of third-party debt exists, interest was allocated from the parent to FPUC and interest used for income tax purposes was based on an interest sync adjustment.

***Respondent: Michael Reno***

Interrogatory No. 108

108. Please refer to MFR Schedule C- 2 Consolidated, Page 1 of 2, Line 1, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 1, which indicate that the PGA and Swing Revenues for the period January 2021 through December 2021 to be excluded are \$45,117,097. However, in active Docket No. 20220003-GU, the Direct Testimony of Witness Waruszewski, filed May 2, 2022, includes Exhibit RCW-1, Schedule A-7, Line 2, showing fuel revenues applicable to the period January 2021 through December 2021 was \$45,671,208, or a net difference of \$554,111. Please reconcile these amounts.

**Company Response:**

The booked amount of PGA and Swing revenue and the amount included in the MFR C-2 Consolidated, Page 1 of 2, Line 1, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 2 is based on the revenue that the Company has actually earned. Therefore, collected revenues are adjusted for under and over recoveries. In addition, our recorded revenues include the regulatory assessment fees which are then eliminated in MFR Schedule C-2 Consolidated, Page 2 of 2, Line 22. However, the \$45,671,208 on RCW-1 is the revenue collected before the removal of the current year over-recovery and is net of the regulatory assessment fees. The remaining difference of \$1,498 was not included in error in the PGA and Swing Revenue when the PGA true-up filing was prepared. Please refer to the reconciliation below:

	MFR Filing	PGA True-up Filing	Difference
PGA & Swing Revenues in MFR C-2, Page 1 of 2, Line 1 and F-5, Page 1 of 2, Line 2	\$ 45,117,097		
PGA & Swing Revenues in RCW-1, Schedule A-7, Line 2		\$ 45,671,208	
PSC Regulatory Assessment Fee in MFR C-2, Page 2 pf 2, Line 22	(220,597)		
Over Recovery current year in RCW-1, Schedule A-7, Line 3		(772,321)	
PSC Regulatory Assessment Fee of current year over recovery		(3,885)	
	<hr/>		
	\$ 44,896,500	\$ 44,895,002	\$ 1,498

***Respondent: Michelle Napier***

Interrogatory No. 109

109. Please refer to MFR Schedule C-2 Consolidated, Page 1 of 2, Line 2, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 2 which indicated that the Conservation Revenues for the period January 2021 through December 2021 to be excluded are \$4,057,964. However, in active Docket No. 20220004-GU, the Direct Testimony of Witness Craig, filed May 2, 2022, includes Exhibit DMC-1, Schedule CT-3, Page 2 of 3, Line 3, showing conservation revenues applicable to the period January 2021 through December 2021 was \$4,037,653, or a net difference of \$20,311. Please reconcile these amounts.

**Company Response:**

The Conservation Revenue of \$4,057,964 that was presented in MFR Schedule C- 2 Consolidated, Page 1 of 2, Line 2, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 2 is the revenue that is recorded in the MFR filed revenue and reconciles to the ledger. The ledger revenue includes regulatory assessment fees on the revenue of \$20,311. In Docket 20220004-GU, Conservation revenues are shown net of the regulatory assessment fees. The PSC regulatory assessment fee of \$20,311 is also eliminated in MFR Schedule C-2 Consolidated, Page 2 of 2, Line 23. Thus, the net effect to the filing is the same as filed in the conservation filing.

***Respondent: Michelle Napier***

Interrogatory No. 110

110. Please refer to MFR Schedule C-2 Consolidated, Page 1 of 2, Line 10, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 10 which indicated that the Conservation Expenses for the period January 2021 through December 2021 to be excluded are \$4,038,002. However, in active Docket No. 20220004-GU, the Direct Testimony of Witness Craig, filed May 2, 2022, includes Exhibit DMC-1, Schedule CT-3, Page 1 of 3, Line 19, showing conservation expenses applicable to the period January 2021 through December 2021 was \$3,653,829, or a net difference of \$384,173. Please reconcile these amounts.

**Company Response:**

First, DMC-1 was revised on August 5, 2022. Although the expense amount didn't change, the revised filing showed the ending true-up as an over-recovery of \$748,861. This over-recovery consists of the prior year over-recovery of \$364,692 and the current year over-recovery of \$384,169. The current over/under recovery of conservation costs is recorded in conservation expense in the ledger account 906 and is shown on MFR C-7, line 8 as \$384,170. The difference between the conservation expense of \$4,038,002 that was presented in MFR Schedule C- 2 Consolidated, Page 1 of 2, Line 10, and MFR Schedule F-5 Consolidated, Page 1 of 2, Line 10 and the conservation expense of \$3,653,829 included in Exhibit DMC-1, Schedule CT-3 Page 1 of 3, Line 19 is the current year conservation over recovery of \$384,173.

***Respondent: Michelle Napier***

**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 – Fort Meade and Florida	)	
<u>Public Utilities – Indiantown Division</u>	)	Filed: October 10, 2022

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 88, 92, AND 108-110 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.

*Michelle Napier*

Michelle Napier, Declarant

Dated: 10/6/2022

**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 – Fort Meade and Florida )  
Public Utilities – Indiantown Division ) Filed: October 10, 2022

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 107 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.



Michael Reno, Declarant

Dated:

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**  
**20220067.GU Staff Hearing Exhibit 00197**

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

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 93 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.



\_\_\_\_\_  
Jason Bennett, Declarant

Dated: 9/30/22



**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 – Fort Meade and Florida )  
Public Utilities – Indiantown Division ) Filed: October 10, 2022

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 95 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.



Michael Cassel, Declarant

Dated:

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

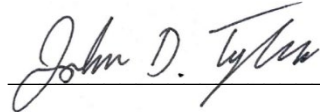
In re: Petition for rate increase by Florida ) Docket No. 20220067-GU  
Public Utilities Company, Florida Division of )  
Chesapeake Utilities Corporation, Florida )  
Public Utilities Company - Fort Meade, and )  
Florida Public Utilities Company - Indiantown ) Filed: October 10, 2022  
Division. )

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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

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

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF's NINTH REQUEST OF AMENDED NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 96, 97, 98, and 105 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.

Wraye Grimard

Wraye Grimard, Declarant

Dated: September 16, 2022

**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 – Fort Meade and Florida	)
Public Utilities – Indiantown Division	) Filed: October 10, 2022
	)

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**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFFS' NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 90, 91, 94, and 106 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.



Kira Lake, Declarant

Dated: October 10, 2022



BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

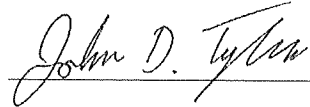
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Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.



John Taylor

Dated: September 27, 2022