

**FPUC's Responses to Staff's Tenth Set of  
Interrogatories, Nos. 111-114 and 116-125**

INTERROGATORIES

Interrogatory No. 111

111. Referring to witness Grimard's testimony and sponsored exhibit, please explain why the "change of account" service charge for Chesapeake utilities was increased 246% from \$13 to \$45 for residential and non-residential customers? In your response, please explain how the methodology to calculate this increase was determined.

**Company Response:**

All miscellaneous charges were calculated and determined by using consolidated processes and costs for each individual activity. The Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units. Indiantown, CFG, Ft. Meade and FPUC have received individual approval from the Commission for each Company's most recently established miscellaneous service charges.

The difference in the charges are a result of consolidation and standardization of processes, expenses, as well as the impact over time on the Company's costs to perform each service since the last time the miscellaneous service rates were calculated.

1. Indiantown's existing service charges were established pursuant to Commission Order No. PSC-04-0565-PAA-GU issued June 2, 2004. This was prior to the acquisition of Indiantown Gas Company by Florida Public Utilities during August 2010.
2. CFG's existing service charges were established pursuant to Commission Order No. PSC-10-0029-PAA-GU issued January 14, 2010.
3. Ft. Meade's existing service charges were established pursuant to Commission Order No. PSC-13-0676-PAA-GU issued December 20, 2013.

4. FPUC's existing service charges were established pursuant to Commission Order No. PSC-09-0375-PAA-GU issued on May 27, 2009.

In each case, the existing service charge rates were approved at a minimum of eight (8) years ago. Further information responsive to this request is provided below, for interrogatory no. 112.

***Respondent: Wraye Grimard***

Interrogatory No. 112

112. Please explain the process of a change of account and any costs associated to change an account.

**Company Response:**

The process of a change of account and the calculation of change of account costs follows:

Process:

Initially, a new customer, who is a new tenant or the new owner of a premise served by the Company contacts the Company's Customer Care office to perform a name change for a specific premise. The Company verifies the address for accuracy, confirms changes to be made in the Company's customer information system, and confirms the changes requested with the customer. A service order is created and a Company representative is scheduled to travel to the respective premise to obtain a meter reading.

The Company field representative receives the service order to read the meter and then (on the scheduled day) travels to the respective premise and obtains a meter reading that will serve as the prior customer's (service) end read and the new customer's (service) beginning read. The field representative completes the necessary documentation and the meter read obtained is then returned to the Company's dispatch office where the documentation is reviewed. The dispatch office then scans the completed service order and forwards it to the back office where the meter read associated with the change of account is memorialized in the Company's customer information system.

Change of Account Calculation:

1. The Company calculated the time that the Company's Customer Care representative spends coordinating the account change with the customer. The time to accomplish the initiation of the requisite meter read by Customer Care is 7 minutes. This was multiplied by the cost per hour for Customer Care time to provide this service of \$19.73. This resulted in a cost of \$2.00, rounded down to the whole dollar.

2. The Company then calculated the time it would take for the Company's field personnel to travel, inspect the meter, read the meter, and to document and memorialize the meter read. The time for the field visit is 33 minutes and the cost per hour to provide this service is \$45.01. The resulting cost for the field trip to read the meter is \$25.00, rounded up to the whole dollar.

3. Supervision and administration for documentation intake, documentation verification, dispatch orders from and then documentation returned to dispatch office, and then documentation scanned and finally returned to the back office. The time to perform these tasks is 25 minutes at a rate of \$42.49 per hour. The resulting cost for this is \$18.00, rounded up to the whole dollar.

4. The resulting expenses to provide this service is summed, resulting in a cost of \$45.00 to perform a change of account by the Company.

The calculations for the change of account charge can be found on Schedule E-3 page 6 of

***Respondent: Wraye Grimard***

Interrogatory No. 113

113. Referring to witness Grimard's testimony and sponsored exhibit, please explain why the "failed trip" service charge for Chesapeake utilities was increased 175% from \$20 to \$55 dollars for residential and non-residential customers. In your response, please explain how the methodology to calculate this increase was determined.

**Company Response:**

The Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units. The difference in the charges are a result of consolidation and standardization of processes, expenses, as well as the impact over time on the Company's costs to perform each service since the last time the miscellaneous service rates were calculated.

The average time spent by a Company employee for a failed trip charge is .91 hours. The average hourly rate for the employee to conduct a failed trip is \$55.63. These numbers are multiplied and Company overhead of \$5.00 is added. The calculation is  $(0.91 \times \$55.63) + \$5.00 = \$55.00$ , rounded down to the whole dollar.

***Respondent: Wraye Grimard***

Interrogatory No. 114

114. In the past five years how many “failed trips” has the company had in its service territory?

**Company Response:**

The Company has had a total of 372 failed trips in its CFG service area over the past five (5) years. The Company has had a total of 969 failed trips in its FPUC service area over the past five (5) years. The Company has had a total of 9 failed trips in its Ft. Meade service area over the past five (5) years. The Company’s Indiantown service area does not have an applicable “failed trip charge”, so the number of failed trips have not been tracked.

***Respondent: Wraye Grimard***

Interrogatory No. 116

116. Please explain what the “Same day or outside normal business hours” charge is.

**Company Response:**

The same day or outside normal business hours charge is charged to those customers when, at the customer’s request (and if the Company’s schedule permits) the Company would perform the requested services either i) the same day that the customer calls for the requested services or ii) outside of the Company's normal business hours of 8 a.m. to 5 p.m. Monday through Friday and those dates that include federal bank holidays.

***Respondent: Wraye Grimard***



Interrogatory No. 117

117. Please explain why the methodology of the “Same day or outside normal business hours” charge was changed from a variable rate based on a customer’s bill to a flat rate of \$200.

**Company Response:**

The flat rate for “Same day or outside normal business hours” was developed to address the existing variability related to the applicability and calculations for the “Same day or outside normal business hours” charge across the Company’s four Florida business units. The Company changed from a variable to flat rate because the Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units.

Previously, the Ft. Meade and FPUC “Same day or outside normal business hours” charges are fixed and based on rate class, Indiantown is a fixed rate for all customer classes and, the CFG rate is the applicable rate based on rate class for the given service at 1.5 times the normal charge.

A standard rate was developed as follows. The average time spent by a Company employee for a “Same day or outside normal business hours” service call is 3.85 hours. This time includes a minimum two hour overtime call out requirement plus the average total time spent to provide this service. To conduct a “Same day or outside normal business hours” service call the average hourly rate for the employee is \$47.36. These numbers are multiplied and Company overhead of \$17.65 is added. The calculation is  $(3.85 \times \$47.36) + \$17.65 = \$200$ , rounded up to the whole dollar.

***Respondent: Wraye Grimard***

Interrogatory No. 118

118. What is a field collection?

**Company Response:**

Field collection is a service provided by the Company when the Company collects a past due bill payment at the customers premise in lieu of disconnecting the customer.

***Respondent: Wraye Grimard***

Interrogatory No. 119

119. Please explain why Indiantown did not have a failed trip charge or a temporary disconnection charge when other divisions did have these charges.

**Company Response:**

Indiantown did not have a failed trip charge or temporary disconnection charge in its tariff. Indiantown's existing service charges were established pursuant to Commission Order No. PSC-04-0565-PAA-GU issued June 2, 2004. This was prior to the acquisition of Indiantown Gas Company by Florida Public Utilities during August 2010 and prior to the consolidation of the Company's service charge rates as proposed in this instant filing. The Company is not aware of why prior Indiantown tariff(s) did not include a failed trip charge or temporary disconnection charge.

***Respondent: Wraye Grimard***

Interrogatory No. 120

120. Please explain how the methodology to determine the charges for the failed trip charge, temporary disconnection charge, late payment charge, and bill collection with service disconnection charge for the Indiantown were calculated.

**Company Response:**

All miscellaneous charges were calculated and determined by using consolidated processes and costs for each individual activity. The Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units. The charges were calculated as follows:

- Failed Trip Charge: Please see response to Staff interrogatory no. 113.
- Temporary Disconnection Charge: Please see response to Staff interrogatory no. 122.
- Late Payment Charge: Indiantown's proposed late payment charge is equivalent to that which was approved pursuant to Commission Order No. PSC-04-0565-PAA-GU issued June 2, 2004.
- Bill Collection with Service Disconnection Charge: Please see minimum filing requirements Schedule E-3 page 5 of 6.

***Respondent: Wraye Grimard***

Interrogatory No. 121

121. Please explain how the methodology to determine the charges for the bill collection with service disconnect charge and a late payment charge for the division of Chesapeake Utilities was determined.

**Company Response:**

All miscellaneous charges were calculated and determined by using consolidated processes and costs for each individual activity. The Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units. The proposed late payment charge for the Florida division of Chesapeake Utilities was adopted and is equivalent to Ft. Meade, Indiantown, and FPUC's proposed late payment charge.

***Respondent: Wraye Grimard***

Interrogatory No. 122

122. Referring to witness Grimard's testimony and sponsored exhibit, please explain why the "temporary disconnection" service charge for Chesapeake utilities was increased 162% from \$21 to \$55 for residential and non-residential customers? In your response, please explain how the methodology to calculate this increase was determined.

**Company Response:**

All miscellaneous charges were calculated and determined by using consolidated processes and costs for each individual activity. The Company proposes to have one standardized group of miscellaneous service charges that would be applicable across all four Florida business units.

The average time spent by a Company employee to provide a temporary disconnect is .91 hours. The average hourly rate for the employee is \$55.63 to conduct a temporary disconnect. These numbers are multiplied and Company overhead of \$5.00 is added. The calculation is  $(0.91 \times \$55.63) + \$5.00 = \$55.00$ , rounded down to the whole dollar.

***Respondent: Wraye Grimard***

Interrogatory No. 123

123. Referring to witness Grimard's testimony and sponsored exhibit, please explain on the Indiantown exhibit page, what is meant by the numbers "\$35/\$60\*" for the current charges for residential and non-residential customers. Please explain when \$35 is used for these charges and please explain when \$60 is used for these charges.

**Company Response:**

We use \$60 dollars when the Company performs a service connection or reconnection requested by the customer on the same day or outside normal business hours for an Indiantown residential or non-residential customer. Otherwise, we use \$35 dollars.

***Respondent: Wraye Grimard***

Interrogatory No. 124

124. Referring to witness Grimard's testimony and sponsored exhibit, please explain on the Florida Public Utilities exhibit page, what is meant by the numbers "\$75 or \$112/\$96\* or 144\*" for the service connection charge for non-residential customers. Please explain a scenario in which each of the four numbers is used on a customer's bill. I.e. "we use \$75 dollars when ..." for all four numbers listed.

**Company Response:**

We use \$75 dollars when the Company performs a service connection scheduled during normal business hours (and not on the same day the customer requests such service connection) for a FPUC customer receiving service from the Company under rate schedules GS-1, GS-2, GTS-1, and/or GTS-2.

We use \$96 dollars when the Company performs a service connection requested by the customer on the same day or outside normal business hours for a FPUC customer receiving service from the Company under rate schedules GS-1, GS-2, GTS-1, and/or GTS-2.

We use \$112 dollars when the Company performs a service connection scheduled during normal business hours (and not on the same day the customer requests such service connection) for a FPUC customer receiving service from the Company under rate schedules LVS, LVTS, IS and/or ITS.

We use \$144 dollars when the Company performs a service connection requested by the customer on the same day or outside normal business hours for a FPUC customer receiving service from the Company under rate schedules LVS, LVTS, IS and/or ITS.

***Respondent: Wraye Grimard***



Interrogatory No. 125

125. Referring to witness Grimard's testimony and sponsored exhibit, please explain on the Florida Public Utilities exhibit page what is meant by the numbers "\$104 or \$141/\$125\* or \$173\*" for the service reconnection charge for non-residential customers. Please explain a scenario in which each of the four numbers is used on a customer's bill. I.e. "we use \$104 dollars when ..." for all four numbers listed.

**Company Response:**

We use \$104 dollars when the Company performs a service reconnection scheduled during normal business hours (and not on the same day the customer requests such service reconnection) for a FPUC customer receiving service from the Company under rate schedules GS-1, GS-2, GTS-1, and/or GTS-2.

We use \$125 dollars when the Company performs a service reconnection requested by the customer on the same day or outside normal business hours for a FPUC customer receiving service from the Company under rate schedules GS-1, GS-2, GTS-1, and/or GTS-2.

We use \$141 dollars when the Company performs a service reconnection scheduled during normal business hours (and not on the same day the customer requests such service reconnection) for a FPUC customer receiving service from the Company under rate schedules LVS, LVTS, IS and/or ITS.

We use \$173 dollars when the Company performs a service reconnection requested by the customer on the same day or outside normal business hours for a FPUC customer receiving service from the Company under rate schedules LVS, LVTS, IS and/or ITS.

***Respondent: Wraye Grimard***

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 12, 2022  
\_\_\_\_\_ )

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF's TENTH REQUEST OF AMENDED NINTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, AND 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, Declarant

Dated: September 30, 2022