

Hublic Service Commission -M-E-M-O-R-A-N-D-U-M-

DATE: July 19, 2002 **TO:** Division of Econor

Division of Economic Regulation (Colson)

FROM: Division of Auditing and Safety (Vandiver)

RE: Docket No. 020002-EG; Company Name: Florida Public Utilities; Audit Purpose: Energy Conservation Cost Recovery Clause audit for the period from January 1 - December 31, 2001; Audit Control No. 02-064-4-2

Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of the Commission Clerk and Administrative Services. There are no confidential work papers associated with this audit.

DNV/jcp Attachment

cc: Division of Auditing and Safety (Hoppe, District Offices, File Folder) Division of the Commission Clerk and Administrative Services (2) Division of Competitive Markets and Enforcement (Harvey) General Counsel Office of Public Counsel

> Mr. George Bachman Florida Public Utilities Co., Gas Division 401 South Dixie Highway, P.O. Box 3395 West Palm Beach, FL 33402

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> DOCUMENT NUMBER ON C 07628 JUL 23 8 FPSC-COMMISSION CLERK



FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF AUDITING AND SAFETY BUREAU OF AUDITING

Miami District Office

FLORIDA PUBLIC UTILITIES COMPANY

ELECTRIC CONSERVATION COST RECOVERY CLAUSE

HISTORICAL YEAR ENDED DECEMBER 31, 2001

DOCKET NO. 020002-EG AUDIT CONTROL NO. 02-064-4-2

Raymond Grant Audit Manager

Kathy L. Welch, Audit Supervisor

TABLE OF CONTENTS

I.	AUDITOR'S REPORT PAGE AUDIT PURPOSE 1 DISCLAIM PUBLIC USE 1 SUMMARY OF SIGNIFICANT PROCEDURES 2
11.	AUDIT DISCLOSURESPROMOTIONAL ITEMS3PROMOTIONAL ITEMS-CONTRACTORS PLANNERS4ACCIDENT REPAIR EXPENSES5OFFICE RENOVATIONS6BILLING7
III.	COMPANY EXHIBITS8CT-3 SCHEDULES9

DIVISION OF AUDITING AND SAFETY BUREAU OF AUDITING

JULY 5, 2002

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to the attached Conservation Cost Recovery schedules for the period ended December 31, 2001 for Florida Public Utilities Company Electric Division. These schedules were prepared by the utility as part of its petition for Conservation Cost Recovery in Docket 020002-EG.

This is an internal accounting report prepared after performing a limited scope audit. Accordingly, this report should not be relied upon for any purpose except to assist the Commission staff in the performance of their duties. Substantial additional work would have to be performed to satisfy generally accepted auditing standards and produce audited financial statements for public use.

SUMMARY OF SIGNIFICANT PROCEDURES

Our audit was performed by examining, on a test basis, certain transactions and account balances which we believe are sufficient to base our opinion. Our examination did not entail a complete review of all financial transactions of the company. Our more important audit procedures are summarized below. The following definitions apply when used in this report:

Scanned- The documents or accounts were read quickly looking for obvious errors.

Compiled- The exhibit amounts were reconciled with the general ledger, and accounts were scanned for error or inconsistency.

Reviewed- The exhibit amounts were reconciled with the general ledger. The general ledger account balances were traced to subsidiary ledgers, and selective analytical review procedures were applied.

Examined- The exhibit amounts were reconciled with the general ledger. The general ledger account balances were traced to subsidiary ledgers. Selective analytical review procedures were applied, and account balances were tested to the extent further described.

Confirmed-Evidential matter supporting an account balance, transaction or other information was obtained directly from an independent third party.

Verified- The item was tested for accuracy, and substantiating documentation was examined.

Conservation Recovery Schedules: Traced the filing to the general ledger. Reconciled revenues to the revenue and rate reports. Recalculated revenues to verify that the correct rate was used.

Examined all expense accounts for unusual entries and reviewed those invoices for compliance with the programs' guidelines and Commission policy.

True-up Calculation- Recalculated the true up provision for the twelve months ended December 31, 2001 to determine the accuracy of the current true-up amount for the period under audit. Traced the interest rates to the Wall Street Journal-30 day Commercial Paper Rate.

AUDIT DISCLOSURES

AUDIT DISCLOSURE NO. 1

SUBJECT: PROMOTIONAL ITEMS

STATEMENT OF FACT: The company purchased several items from RK Promotions to give to builders as gifts in order to promote the conservation program. Most of the items have Florida Public Utilities and the Good Cents logo imprinted on them.

The total spent on these items in the year 2001 is \$6,771.61 and the charges were made to account 908. A breakdown of the charges and a description of the promotional items follows:

Date 4/2/01 4/2/01 4/2/01 4/2/01 4/2/01 5/4/01	Invoice 2283 2285 2287 2289 2293 2304	Description 1,010 Rulers 1,000 Pens 1,040 Zipper Pull 530 Pencils 505 Bubble Pens 523 Golfers Bags	Amount \$ 306.61 \$ 516.30 \$ 311.34 \$ 96.75 \$ 798.37 \$1,339.97
Total Ma	rianna		\$3,369.34
4/2/01 4/2/01 4/2/01 4/2/01 4/2/01 5/4/01 Total Fer Grand To		1,010 Rulers 1,000 Pens 1,040 Zipper Pull 530 Pencils 505 Bubble Pens 536 Golfers Bags	\$ 306.61 \$ 516.30 \$ 311.34 \$ 96.75 \$ 798.37 \$1,372.90 \$3,402.27 \$6,771.61

According to Commission Rule 25-17.015, "In determining whether an advertisement is "directly related to an approved conservation program", the Commission shall consider, but is not limited to, whether the advertisement or advertising campaign:

- 1. Identifies a specific problem;
- 2. States how to correct the problem; and
- 3. Provides direction concerning how to obtain help to alleviate the problem."

OPINION: These promotional expenses were approved as reasonable advertising expenses in Order No. PSC-01-2381-FOF-EG, Docket No. 010002-EG, page 6. However, the analyst requested that these types of charges be disclosed.

SUBJECT: PROMOTIONAL ITEMS- CONTRACTOR'S PLANNERS

STATEMENT OF FACT: The company purchased 355 contractor's planners from Aspen Corporate Identity Group to give to builders as gifts in order to promote the conservation program. The planners have the Florida Public Utilities name and the logo imprinted on the front. The total spent on contractor's planners during the test year ending December 2001 and charged to electric conservation expenses was \$2,638.90. The company recorded the charges to accounts 114/115.401.908 -Customer Assistance Expense. A breakdown of the charges follows:

Date	Invoice	Description	Marianna 114	Fernandina 115	Total
	1134266 1111168 1134270	100 Contractor's Planners 105 Contractor's Planners 150 Contractor's Planners	\$ 747.80	\$ 760.72 \$1,130.38	\$ 747.80 \$ 760.72 \$1,130.38
Total		355	\$ 747.80	\$1,891.10	\$2,638.90

According to Commission Rule 25-17.015, "In determining whether an advertisement is "directly related to an approved conservation program", the Commission shall consider, but is not limited to, whether the advertisement or advertising campaign:

- 1. Identifies a specific problem;
- 2. States how to correct the problem; and
- 3. Provides direction concerning how to obtain help to alleviate the problem."

OPINION: These promotional expenses were approved as reasonable advertising expenses in Order No. PSC-01-2381-FOF-EG, Docket No. 010002-EG, page 6. However, the analyst requested that these types of charges be disclosed.

SUBJECT: ACCIDENT REPAIR EXPENSES

STATEMENT OF FACTS: The company included automobile repair expenses of \$3,210.07 in account 114.4010.910. A Toyota Sienna leased by the company and assigned to an employee who charged 100% of her time to conservation was involved in an accident. The company vehicle was at fault. Therefore, Florida Public Utilities Company paid to repair the company vehicle and the other vehicle that was damaged. The company's insurance policy cover claims over \$250,000. Claims under \$250,000 are paid by the company.

However, the company has informed us that conservation vehicles are not covered under the policy at all and would be charged 100% to conservation even if the claims are over the limit. A breakdown of the repair charges follows:

Vendor	Description	Amount
Mercers Paint & Body Shop	To repair other vehicle " GMC Sonoma"	\$1,331.69
Hollis Body Shop	To repair company vehicle "Toyota Sienna"	\$1,878.38
Total		\$3,210.07

OPINION: This should be reviewed by staff analyst to determine if an adjustment is required.

SUBJECT: OFFICE RENOVATIONS

STATEMENT OF FACT: In October 2001, the company incurred charges totaling \$59,713 for the renovation of a flower shop into offices and a gas showroom at the Fernandina Beach office. Of the total charges incurred, \$39,240 was for actual construction costs and \$20,473 was for painting, phone equipment, furniture, fixtures and other miscellaneous expense.

The charges were recorded in miscellaneous account 186.1 until the project was completed. When the project was completed in September 2001, the company wrote off \$4,976 per month (\$59,713/12) from October 2001 through September 2002. The company allocated \$796 (16% of \$4976) per month to conservation expenses. The 16% used to allocate the expenses to conservation was based on actual square footage of the office space used by conservation department. The company calculations follows:

Leasehold Improvements	\$59,713
Divided by 12 months	\$ 4,976
Alloc %	16%
Monthly Expense	\$ 796
Times 3 Months 10/01-12/01	3
Total Booked to Expense	\$ 2,388

When these expenses were questioned during the audit, the company decided to change its methodology. The company provided the amounts to expense the leasehold improvements over the length of the lease as authorized by GAAP. On June 12, 2002, the company reversed all charges previously expensed for 2001 and 2002 and reallocated the leasehold improvements of \$39,240 over 3 year period and other expenses of \$20,473 over one year.

The company calculations follows:

	Leasehold Improvment	Other Expenses	Total
Leasehold Improvements	\$39,240	\$20,473	\$59,713
Period (Months)	36	12	
Monthly Expense	\$1,090	\$1,706	
Alloc %	16%	16%	
Monthly Conservation Exp	\$174.40	\$272.97	\$447.37
Three months 10/01-12/01	3	3	3
Total	\$523.20	\$818.91	\$1,342.11

OPINION: Conservation expenses for January through December 2001 are overstated by \$1,046.39 (\$2,388.50 - \$1,342.11).

SUBJECT: BILLING

STATEMENT OF FACTS: In January 2001, the company billed its Fernandina division GSLD customers, Jefferson Smurfit Corporation and Rayoiner at the previous years rate of \$0.00027 per KWH instead of the new rate of \$0.00038. This has caused total revenues as recalculated by staff to be understated by \$1,376.

OPINION: The true-up and Interest Provision schedule CT-3 page 2 and 3, reflects the revenues billed and recorded and therefore the true-up schedule is correct. However, the company made an error in charging their customers the incorrect rate in January 2001.

EXHIBITS

CT 3 SCHEDULES FERNANDINA

CT 3 SCHEDULES MARIANNA

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - FERNANDINA

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SCHEDULE CT-3 PAGE 1 OF 3

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION SUMMARY OF EXPENSES BY PROGRAM BY MONTH

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FOR MONTHS January-01 THROUGH December-01

A.	CONSERVATION EXPENSE BY PROGRAM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER D	ECEMBER	TOTAL
1 2 3. 4 5 6 7 8														0 0 0 0 0 0
9 10, 11 12 13 14 15 16 17, 18 19 20	Common Residential Geothermal Heat Pump GoodCents Home/Energy Star GoodCents Energy Survey Program GoodCents Loan Program GoodCents Commercial Building GoodCents Commercial Building GoodCents Commercial Tech Assistance Low Income Affordable Housing/Builders Program	2,957 17 2,147 1,607 300 480 589 0 0 0	6,803 33 7,938 5,971 103 504 44 33 33 0	5,460 60 2,151 4,155 259 316 159 60 60 60 0	4,994 37 3,335 3,800 689 2,721 37 0 0 0	4.674 73 4,524 3,226 117 588 268 0 0 0	4,710 84 2,257 125 511 746 0 0	4,938 308 1,584 2,507 122 440 844 29 29 29 0	5,688 368 4,174 4,512 182 472 348 245 7 0	5,804 787 4,752 3,678 133 488 739 22 22 0 0	7,741 131 5,424 1,704 134 447 317 44 0 0	13,861 94 4,476 1,634 139 737 618 46 0 0	7,037 90 2,306 1,582 150 370 445 63 18 0	0 74,667 2,082 45,068 37,363 2,453 8,074 5,154 5,154 542 147 0
21 22.	TOTAL ALL PROGRAMS LESS AMOUNT INCLUDED IN RATE BASE	8,097	21,462	12,680	15,613	13,470	11,420	10,801	15,996	16,403	15,942	21,605	12,061	175,550
23	RECOVERABLE CONSERVATION EXPENSES	8,097	21,462	12,680	15,613	13,470	11,420	10,801	15,996	16,403	15,942	21,605	12,061	175,550

EXHIBIT NO _____ DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 23 OF 36

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COMPANY: FLORIDA PUBLIC UTILITIES COMPANY • FERNANDINA

SCHEDULE CT-3 PAGE 2 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-01 THROUGH December-01

В.	CONSERVATION REVENUES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER D	ECEMBER	TOTAL
1	RESIDENTIAL CONSERVATION													0
2	CONSERVATION ADJ. REVENUES	15,683	13,846	12,370	12,730	12,212	13,701	15,534	15,265	14,158	12,344	11,134	11,352	160,329
3	TOTAL REVENUES	15,683	13,846	12,370	12,730	12,212	13,701	15,534	15,265	14,158	12,344	11,134	11,352	160,329
4	PRIOR PERIOD TRUE-UP ADJ NOT APPLICABLE TO THIS PERIOD	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(22)	(25)	(267)
5	CONSERVATION REVENUE APPLICABLE	15,661	13,824	12,348	12,708	12,190	13,679	15,512	15,243	14,136	12,322	11,112	11,327	160,062
6	CONSERVATION EXPENSES (FROM CT-3, PAGE 1, LINE 23)	8,097	21,462	12,680	15,613	13,470	11,420	10,801	15,996	16,403	15,942	21,605	12,061	175,550
7	TRUE-UP THIS PERIOD (LINE 5 - 6)	7,564	(7,638)	(332)	(2,905)	(1,280)	2,259	4,711	(753)	(2,267)	(3,620)	(10,493)	(734)	(15,488)
8	INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10)	18	15	(2)	(8)	(15)	(12)	(1)	6	1	(4)	(16)	(23)	(41)
9	TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH	(267)	7,337	(264)	(576)	(3,467)	(4,740)	(2,471)	2,261	1,536	(708)	(4,310)	(14,797)	(267)
9A	DEFERRED TRUE-UP BEGINNING OF PERIOD													
10	PRIOR TRUE-UP COLLECTED (REFUNDED)	22	22	22	22	22	22	22	22	22	22	22	25	267
11	TOTAL NET TRUE-UP (LINES 7+8+9+9A+10)	7,337	(264)	(576)	(3,467)	(4,740)	(2,471)	2,261	1,536	(708)	(4,310)	(14,797)	(15,529)	(15,529)

EXHIBIT NO DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 24 OF 36

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COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - FERNANDINA

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SCHEDULE CT-3 PAGE 3 OF 3

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FOR MONTHS January-01 THROUGH December-01

CALCULATION OF TRUE-UP AND INTEREST PROVISION

c.	INTEREST PROVISION	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1	BEGINNING TRUE-UP (LINE B-9)	(267)	7,337	(264)	(576)	(3,467)	(4,740)	(2,471)	2,261	1,536	(708)	(4,310)	(14,797)	(267)
2	ENDING TRUE-UP BEFORE INTEREST {LINES B7+B9+B9A+B10}	7,319	(279)	(574)	(3,459)	(4,725)	(2,459)	2,262	1,530	(709)	(4,306)	(14,781)	(15,506)	(15,488)
3	TOTAL BEG AND ENDING TRUE-UP	7,052	7,058	(838)	(4,035)	(8,192)	(7,199)	(209)	3,791	827	(5,014)	(19,091)	(30,303)	(15,755)
4	AVERAGE TRUE-UP (LINE C-3 X 50%)	3,526	3,529	(419)	(2,018)	(4,096)	(3,600)	(105)	1,896	414	(2,507)	(9,546)	(15,152)	(7,878)
5	INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	6.50%	5 55%	5 15%	5 00%	4 37%	3 94%	3.80%	3 67%	3 47%	2 67%	2 22%	2 04%	
6.	INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	5 55%	5 15%	5 00%	4 37%	3 94%	3 80%	3 67%	3 47%	2.67%	2 22%	2 04%	1.78%	
7	TOTAL (LINE C-5 + C-6)	12 05%	10 70%	10 15%	9 37%	8 31%	7 74%	7 47%	7 14%	6.14%	4.89%	4 26%	3 82%	
8	AVG INTEREST RATE (C-7 X 50%)	6 03%	5 35%	5 08%	4 69%	4 16%	3 87%	3 74%	3 57%	3 07%	2.45%	2.13%	1 91%	
9.	MONTHLY AVERAGE INTEREST RATE	0 502%	0 446%	0.423%	0 390%	0 346%	0 323%	0 311%	0 298%	0 256%	0.204%	0.178%	0.159%	
10	INTEREST PROVISION (LINE C-4 X C-9)	18	15	(2)	(8)	(15)	(12)	(1)	6	11	(4)	(16)	(23)	(41)

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EXHIBIT NO. DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 25 OF 36

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COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

SCHEDULE CT-3 PAGE 1 OF 3

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION SUMMARY OF EXPENSES BY PROGRAM BY MONTH

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FOR MONTHS January-01 THROUGH December-01

A CONSERVATION EXPENSE

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A	BY PROGRAM	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1. 2 3. 4 5 6 7 8									·					
9 10 11. 12, 13 14 15, 16 17, 18 19 20	GoodCents Energy Survey Program GoodCents Loan Program GoodCents Commercial Building GoodCents Commercial Tech Assistance	6,395 0 3,698 4,176 455 783 1,092 0 0 0 0	6,710 0 5,134 4,142 1,428 555 865 0 0 1	7,800 0 1,854 2,387 550 484 573 0 0 0 0	5,060 0 4,007 3,449 952 621 514 0 0 78	6,179 0 5,692 2,951 611 370 614 0 1,267	4,560 0 2,930 2,912 721 388 213 0 0 (1,213)	4,204 0 1,974 2,596 1,138 584 1,218 0 0 (134)	6,164 0 4,023 4,509 762 390 620 0 0 0 1	4,194 342 4,474 2,812 1,395 786 540 106 106 0	4,803 1,156 5,210 2,961 617 788 1,056 0 0 0	7,043 417 4,138 2,414 652 738 0 0 0	2,527 173 5,258 4,812 405 1,727 582 0 0 0	0 65,639 2,088 48,392 40,161 9,258 8,128 8,626 106 106 0
21 22.	TOTAL ALL PROGRAMS LESS AMOUNT INCLUDED IN RATE BASE	16,599	18,836	13,648	14,721	17,684	10,511	11,580	16,489	14,755	16,591	15,606	15,484	182,504
23.		16,599	18.836	13,648	14,721	17,684	10,511	11,580	16,489	14.755	16,591	15,606	15 484	182,504

EXHIBIT NO. DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 5 OF 36

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COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

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SCHEDULE CT-3 PAGE 2 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-01 THROUGH December-01

в.	CONSERVATION REVENUES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1	RESIDENTIAL CONSERVATION													0
2.	CONSERVATION ADJ REVENUES	16,563	12,703	10,976	11,054	11,545	14 320	16,475	15,792	15,934	13.064	12,279	12,365	163,070
3.	TOTAL REVENUES	16,563	12,703	10,976	11,054	11,545	14,320	,16,475	15,792	15,934	13,064	12,279	12,365	163,070
4	PRIOR PERIOD TRUE-UP ADJ NOT APPLICABLE TO THIS PERIOD	(674)	(674)	(674)	(674)	(674)	(674)	(674)	(674)	(674)	(674)		(671)	(8,085)
5	CONSERVATION REVENUE APPLICABLE	15,889	12,029	10,302	10,380	10,871	13,646	15,801	15,118	15,260	12,390	11,605	11,694	154,985
6.	CONSERVATION EXPENSES (FROM CT-3, PAGE 1, LINE 23)	16,599	18,836	13,648	14,721	17,684	10,511	11,580	16,489	14,755	16,591	15,606	15,484	182,504
7.	TRUE-UP THIS PERIOD (LINE 5 - 6)	(710)	(6,807)	(3,346)	(4,341)	(6,813)	3,135	4,221	(1,371)	505	(4,201)	(4,001)	(3,790)	(27,519)
8	INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10)	(42)	(50)	(66)	(74)	(83)	(82)	(65)	(56)	(48)	(40)	(41)	(42)	(689)
9,	TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH	(8,085)	(8,163)	(14,346)	(17,084)	(20,825)	(27,047)	(23,320)	(18,490)	(19,243)	(18,112)	(21,679)	(25,047)	(8,085)
9A	DEFERRED TRUE-UP BEGINNING OF PERIOD													
10.	PRIOR TRUE-UP COLLECTED (REFUNDED)	674	674	674	674	674	674	674	674	674	674	674	671	8,085
11.	TOTAL NET TRUE-UP (LINES 7+8+9+9A+10)	(8,163)	(14,346)	(17,084)	(20,825)	(27.047)	(23,320)	(18,490)	(19,243)	(18,112)	(21,679)	(25,047)	(28,208)	(28,208)

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EXHIBIT NO. DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 8 OF 36

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COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

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SCHEDULE CT-3 PAGE 3 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-01 THROUGH December-01

c.	INTEREST PROVISION	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1	BEGINNING TRUE-UP (LINE B-9)	(8,085)	(8,163)	(14,346)	(17,084)	(20,825)	(27,047)	(23,320)	(18,490)	(19,243)	(18,112)	(21,679)	(25,047)	(8,085)
2.	ENDING TRUE-UP BEFORE INTEREST (LINES B7+B9+B9A+B10)	(8.121)	(14,296)	(17,018)	(20,751)	(26,964)	(23,238)	(18,425)	(19,187)	(18,064)	(21,639)	(25,006)	(28,166)	(27 519)
3	TOTAL BEG AND ENDING TRUE-UP	(16,206)	(22,459)	(31,364)	(37,835)	(47,789)	(50,285)	(41,745)	(37,677)	(37,307)	(39,751)	(46,685)	(53,213)	(35,604)
4	AVERAGE TRUE-UP (LINE C-3 X 50%)	(8,103)	(11,230)	(15,682)	(18,918)	(23,895)	(25,143)	(20,873)	(18,839)	(18,654)	(19,876)	(23,343)	(26,607)	(17,802)
5	INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	6 50%	5 55%	5 15%	5 00%	4 37%	3.94%	3 80%	3 67%	3 47%	2 67%	2.22%	2 04%	
6	INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	5 55%	5 15%	5.00%	4 37%	3 94%	3 80%	3 67%	3 47%	2 67%	2 22%	2.04%	1 78%	
7.	TOTAL (LINE C-5 + C-6)	12 05%	10 70%	10 15%	9 37%	8 3 1%	7.74%	7.47%	7 14%	6 14%	4.89%	4 26%	3 82%	
8	AVG INTEREST RATE (C-7 X 50%)	6 03%	5 35%	5.08%	4.69%	4 16%	387%	3 74%	3.57%	3 07%	2 45%	2 13%	1.91%	
9,	MONTHLY AVERAGE INTEREST RATE	0.502%	0 446%	0 423%	0 390%	0 346%	0 323%	0.311%	0 298%	0.256%	0 204%	0 178%	0.159%	
10.	INTEREST PROVISION (LINE C-4 X C-9)	(42)	(50)	(66)	(74)	(83)	(82)	(65)	(56)	(48)	(40)	(41)	(42)	(689)

EXHIBIT NO. DOCKET NO 020002-EG FLORIDA PUBLIC UTILITIES COMPANY (MAP-1) PAGE 7 OF 36

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