State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER ◆ 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

May 19, 2005

TO:

Lee Colson, Division of Economic Regulation

FROM:

Denise N. Vandiver, Chief, Bureau of Auditing

Division of Regulatory Compliance and Consumer Assistance

RE:

Docket No. 050002-EG; Company Name: Florida Public Utilities Co.;

Audit Purpose: Energy Conservation Cost Recovery Clause Audit; Audit

Control No. 05-042-4-2

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 Regulatory Compliance and Consumer Assistance (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. John T. English, President & CEO Florida Public Utilities Co. 401 South Dixie Highway West Palm Beach, FL 33402

Messer Law Firm Norman H. Horton, Jr., Esq./Floyd Self, Esq. P. O. Box 1876 Tallahassee, FL 32302-1876

Mr. Geoff Hartman
Florida Public Utilities Company
P. O. Box 3395
West Palm Beach, FL 33402-3395

DOCUMENT NUMBER-DATE

04949 MAY 20 B



FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE BUREAU OF AUDITING

Miami District Office

FLORIDA PUBLIC UTILITIES ENERGY CONSERVATION COST RECOVERY CLAUSE AUDIT

YEAR ENDED DECEMBER 31, 2004

DOCKET NO. 050002-EG

AUDIT CONTROL NO. 05-042-4-2

Ruth 🛭 Young

Audit Manager

Kathy Welch, Public Utilities Supervisor Miami District Office

TABLE OF CONTENTS

| ١. | AUDITOR'S REPORT | Page |
|-----|--|-------------|
| | Purpose Disclaim Public Use Summary of Significant Procedures | 1 1 2 |
| II | DISCLOSURES | |
| | Revenue Rates Expense Classifications Advertising Expenses | 3 4 5 |
| III | EXHIBITS | 16 |
| | Conservation Cost Recovery Schedules Filed by the Company | |

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE BUREAU OF AUDITING AUDITOR'S REPORT

MAY 13, 2005

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have applied the procedures described later in this report to the attached Electric Conservation Cost Recovery schedules for the period ended December 31, 2004 for Florida Public Utilities Company. These schedules were prepared as part of the petition for fuel recovery in Docket No. 050002-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 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.

Revenues were reconciled to the Orcom Billing Summary. Rates were agreed to the appropriate order. Revenues were recalculated to verify that the correct rate was used.

Examined all expense accounts for unusual entries and reviewed a random sample of invoices for compliance with the program's guidelines and Commission policy. Recalculated payroll.

True-up Calculation: The prior period true-up was traced to the appropriate order and the beginning true-up to the last audit report. Recalculated the true-up provision for the twelve months ended December 31, 2004 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 DISCLOSURE NO. 1

SUBJECT: REVENUE RATES FOR 2004

STATEMENT OF FACTS: In order PSC-03-1375-FOF-EG, the Commission approved .054 cents/kwh for conservation rates if the company's request to consolidate rates for its two divisions was approved in the rate case ruling. The company was given approval to consolidate its conservation rate for its two divisions in the rate case ruling (PSC-04-0369-AS-EI). The new base rates were effective April 15, 2004.

Marianna

The conservation order indicated a consolidated rate of .054. However, the company billed its Marianna division .053 for all of 2004. The Commission approved a tariff for Marianna effective April 15, 2004 for .053.

Fernandina

The company billed its Fernandina division .054 in January, February and half of March. It billed its customers .053 for the rest of the year. The Commission approved a tariff for Fernandina effective April 15, 2004 for .053.

OPINION: The filing represents the rates actually used to bill the customers.

AUDIT DISCLOSURE NO. 2

SUBJECT: EXPENSE CLASSIFICATIONS

STATEMENT OF FACTS: Included in the advertising and general and administrative expenses on Schedules CT-2, pages 1 and 2 are payroll and labor expenses for both Fernandina and Mariana. Also, included in payroll are general and administrative expenses. The table below shows the differences in the expense classifications.

| | | | General & |
|---|-----------------|--------------------|---------------------------|
| Fernandina | <u>Payroll</u> | Advertising | Admin. |
| CT – 2 Total | 64,972 | 55,011 | 15,877 |
| Salaries in Advertising that should | , | , | |
| <u> </u> | E 60E | E 60E | |
| be Payroll | 5,685 | -5,685 | |
| Salaries in General & Admin. that | | | |
| should be Payroll | 7,054 | | -7,054 |
| Items in Payroll that should be in | | | |
| General and Administrative | -3,510 | | 3,510 |
| Reclass of Fernandina Expenses | 74,201 | 49,326 | 12,333 |
| • | • | , | . – , |
| | | | General & |
| Marianna | Dovrell | Advantaina | |
| | Payroll | <u>Advertising</u> | Admin |
| CT 2 Tatal | | | |
| CT – 2 Total | 90,435 | 80,310 | 12,216 |
| | 90,435 | 80,310 | 12,216 |
| Salaries in Advertising that should | • | · | 12,216 |
| Salaries in Advertising that should be Payroll | 90,435 6,271 | 80,310 -6,271 | 12,216 |
| Salaries in Advertising that should be Payroll Items in Payroll that should be in | 6,271 | · | , |
| Salaries in Advertising that should be Payroll | • | · | 12,216 3,381 15,597 |

OPINION: The reclassification does not change the total conservation costs.

AUDIT DISCLOSURE NO. 3

SUBJECT: ADVERTISING EXPENSES

STATEMENT OF FACT: In Commission Rule 25-17.0015, Florida Administrative code, the commission set forth standards for conservation advertising. They are:

- 1. Is the ad related to an approved conservation program?
- 2. Does the advertising address a specific problem?
- 3. Does the ad state how to correct the problem?
- 4. Does the ad provide direction on how to obtain help to alleviate the problem?

A sample of advertising and promotion invoices revealed that some of the ads, some of the promotional items, and dues to different organizations partially meet the criteria set forth in the Commission rule. A list and description of these items follow. These are presented for the analyst's review.

COMPANY: TITLE PERIOD FPUC - ELECTRIC

PROMOTIONS AND DUES SUMMARY YEAR ENDED DECEMBER 31, 2004

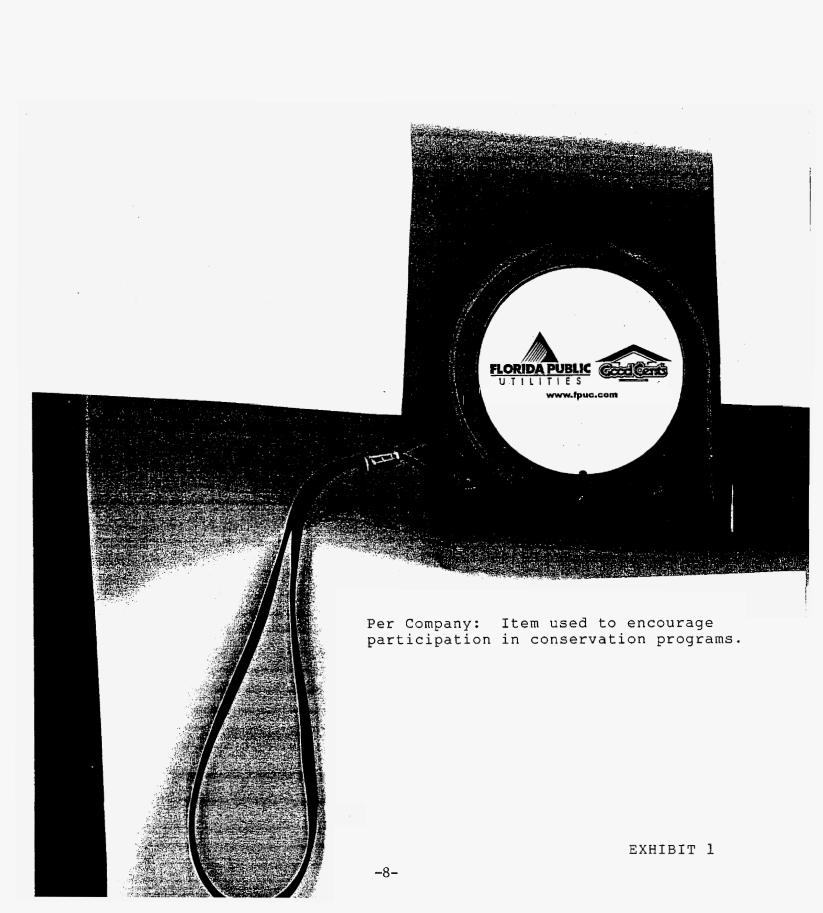
| | | | Marianna | Fernandina |
|------------|-----------------------|--|----------|------------------------|
| Туре | Payee | Explanation | Amount | Amount |
| PROMOTIONS | | O'M Desilvate to Delitare | | |
| | Gazebo Coffee Shop | Gift Baskets to Builders | | |
| | | Send food baskets to builders who | | |
| | | work on Good Cents Programs | | |
| | | as a good relations promotion. | 200.57 | , |
| | SunTrust Bank Card | Builders Dinner | 1,715,46 | } |
| | Friendly Flower Shop | For dinner decorations and give away | 438.60 | |
| | | at end of dinner. | | |
| | Brown & Bigelow | The items below are given out | | |
| | | to builders to encourage participation | | |
| | | and continued participation in the | | |
| | | Good Cents conservation programs | | |
| Exhibit 1 | | <u>Tape Measures</u> | 1,134.55 | 5 1,134. 55 |
| | | Name of Company, Good Cents Logo, | | |
| | | and web site address | | |
| | | <u>Mugs</u> | 246.57 | 7 246.57 |
| | | Name of Company, Good Cents Logo, | | |
| | | and web site address | | |
| | | "Conserving Energy Makes Good | | |
| | | Sense? | | |
| Exhibit 2 | | Portfolios and Calculators | 1,365.2 | 1,365.21 |
| | | Name of Company, Good Cents Logo, | ., | , |
| | | and web site address | | |
| | SEBC | South Eastern Builders Conference | | |
| | | Attendance at conference for | | |
| | | educational purposes (continuing | | |
| | | education) and the opportunity | | |
| | | to meet builders and promote the | | |
| | | Good Cents Program. | 455.0 | 210.00 |
| | Rosen Center Hotel | Rosen Center Hotel | | |
| | | Cost of Hospitality Suite to | | |
| | | promote The Good Cents Program | | |
| | | to home builders. | 974.9 | 2 1,115.1 |
| | | | 197.1 | , |
| | Rosen Center Hotel | Banquet preparation for | 208.3 | |
| | 1100011 Obitto 110001 | hospitality suite. | 200.0 | 200.00 |
| Exhibit 3 | Brown and Bigelow | Engraving on Quill Pens 1/2 | 762.5 | 1 462.51 |
| | | 150 pens each with FPUC logo | | |
| | | and Good Cents Logo on Cap. | | |

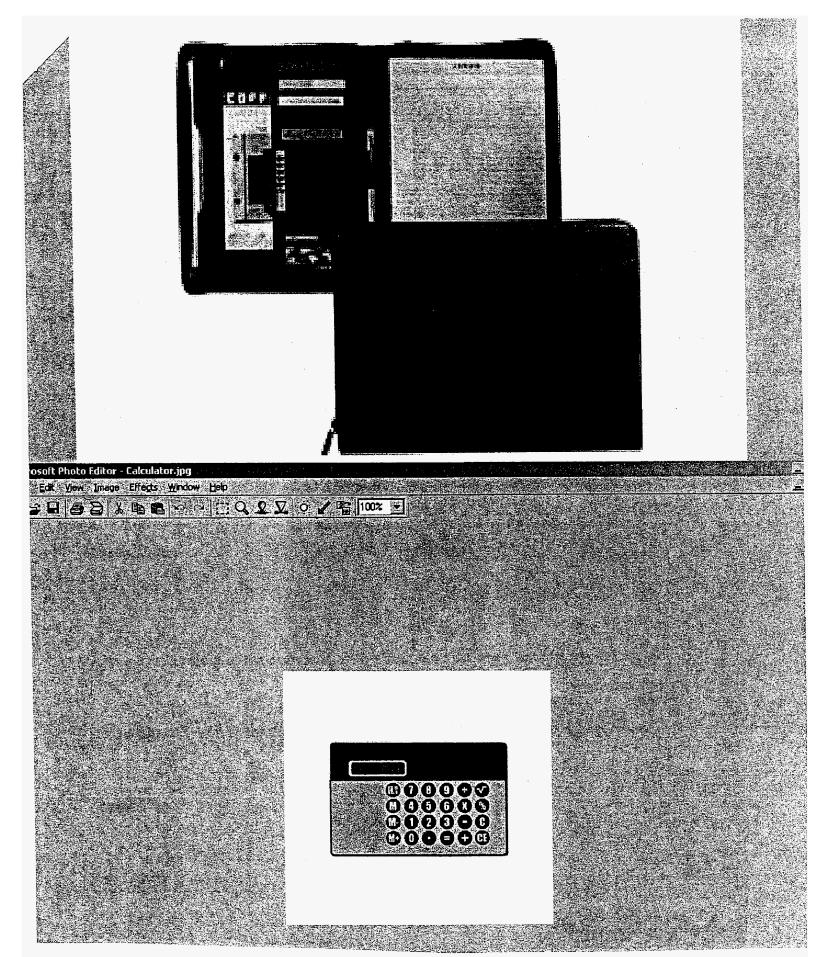
COMPANY:

FPUC - ELECTRIC

TITLE PERIOD PROMOTIONS AND DUES SUMMARY YEAR ENDED DECEMBER 31, 2004

| Туре | Payee | Explanation | | ernandina mount |
|-----------|--------------------------------|--|----------|--------------------|
| Exhibit 4 | Optimist Club of Fernandina | Sponsor Hole at Sheriff/Optimist Golf Tournament and display banner at a prominent position. | | 75.00 |
| | | Four Players FPUC representative entered golf tournament with three builders to promote the "GoodCents" programs. | | 400.00 |
| Exhibit 5 | Chamber of commerce | Golf Tournament Sponsor Hold at the Chamber of Commerce Golf Tournament | | 300.00 |
| Exhibit 6 | J & L Graphics | Graphics on Sweatshirts Items for GoodCents builders and trade allies. | | 459.03 |
| DUES | ⊃ilot Club of Marianna | Belong to a service organization to make contact in the community. From time to time make a presentation explaining conservation programs. This exposes conservation to the community. | 268.44 | |
| | Amelia Island Realtors | Belong to organization to make contact in the community. This exposes conservation to the community. | | 150.00 |
| | | | 7,967.29 | 6,381.76 |

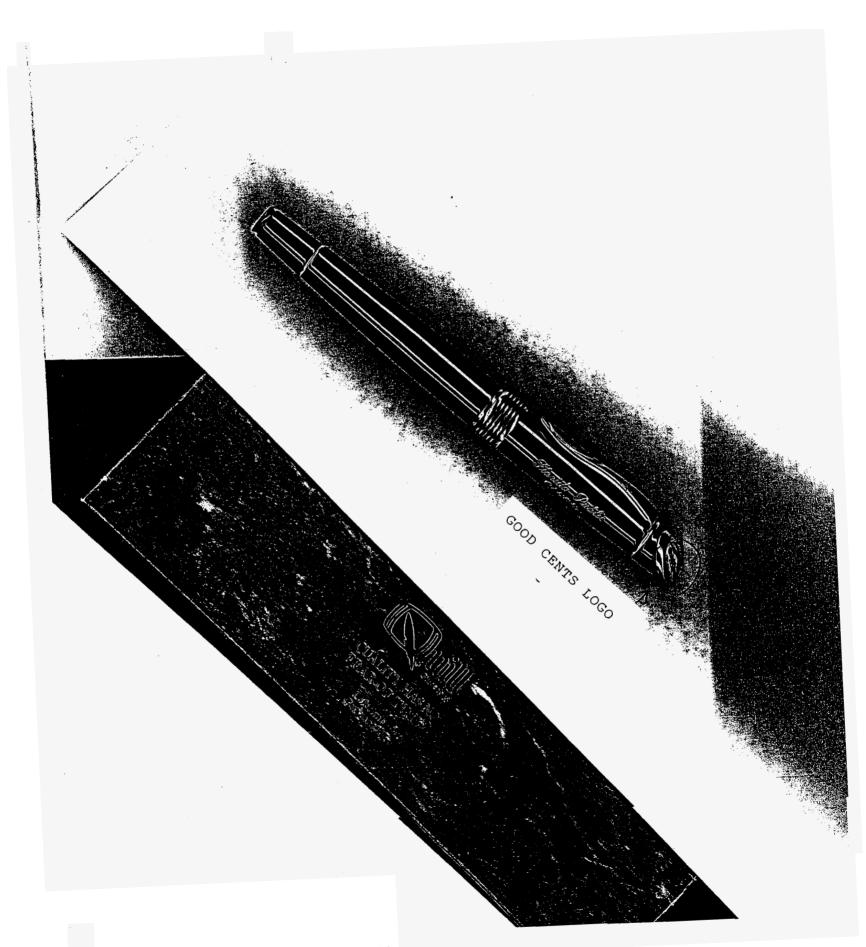




PADFOLIO

EXHIBIT 2

www.fpuc.com



FB OPTIMIST CLUB GOLF TOURNAMENT OCTOBER 13, 2004



Promotional Banner on Pro Shop Porch is used to promote conservation programs to:

- (A) Tournament Players, Members and Guests
- (B) Everyone visiting the club on this day.



FB Optimist Club Golf Tournament - October 13, 2004



Featuring the New Construction, GoodCents, Yard Sign. Reinforce Program and Marketing Support.



GRAPHIC FOR SWEATSHIRTS
Pocket - Florida Public Utilities
Sleeve - GoodCents Logo



COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

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

FOR MONTHS

January-04 THROUGH December-04

| Α. | CONSERVATION EXPENSE 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. | Common Residential Geothermal Heat Pump GoodCents Home/Energy Star Program GoodCents Energy Survey Program GoodCents Loan Program GoodCents Commercial Building Program GoodCents Commercial Tech. Assist. Program Affordable Housing/Builders Program Prior Year Program | 6,938 0 5,998 6,279 (60) (110) 370 0 | 3,885 0 5,155 4,542 (55) 213 1,638 0 0 | 3,882 0 6,178 7,314 (60) 1,303 1,512 0 0 | 2,907 0 8,023 3,930 0 410 790 0 0 | 13,974 0 4,010 2,847 (2,871) 965 1,234 0 0 | 3,925 0 8,701 6,206 (60) 491 2,991 0 0 | 7,750 0 4,598 4,757 (60) 438 1,992 0 0 | 5,001 0 7,270 7,364 (60) 705 1,368 0 0 | (5,494) 0 2,567 3,060 (60) 792 1,081 0 0 | 9,296 0 2,156 5,280 (102) 159 37 0 | 8,979 0 2,669 2,330 (71) 910 459 0 0 | 7,834 0 6,941 6,342 (60) 1,324 1,113 0 0 | 0 0 0 0 0 0 0 0 0 68.877 0 64,266 60,251 (3,519) 7,600 14.585 |
| 21. | TOTAL ALL PROGRAMS | 19,415 | 15,378 | 20,129 | 16,060 | 20,159 | 22,254 | 19,475 | 21,648 | 1,946 | 16,826 | 15,276 | 23,494 | 212,060 |
| 22. | LESS AMOUNT INÇLUDED IN RATE BASE | | | | | | | | | | | | | |
| 23. | REÇOVERABLE CONSERVATION EXPENSES | 19,415 | 15,378 | 20,129 | 16,060 | 20,159 | 22,254 | 19,475 | 21,648 | 1,946 | 16,826 | 15,276 | 23,494 | 212,060 |

EXHIBIT NO. DOCKET NO. 050002-EG FLORIDA PUBLIC UTILITIES COMPANY (RLS-1) PAGE 5 OF 36

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS

January-04 THROUGH December-04

| В. | CONSERVATION REVENUES | JANUARY | FEBRUARY | MARCH | APRIL | MAY | JUNE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | TOTAL |
|-----|--|---------|----------|---------|---------|----------|----------|----------|----------|-----------|----------|----------|----------|----------|
| 1. | RESIDENTIAL CONSERVATION | | | | | | | | | | | | | a |
| 2. | CONSERVATION ADJ. REVENUES | 15,473 | 13,651 | 12,295 | 11,338 | 11,593 | 14,828 | 16,364 | 16,096 | 15,347 | 13,578 | 12,096 | 13,069 | 165,728 |
| 3. | TOTAL REVENUES | 15,473 | 13,651 | 12,295 | 11,338 | 11,593 | 14,828 | 16,364 | 16,096 | 15,347 | 13,578 | 12,096 | 13,069 | 165,728 |
| 4. | PRIOR PERIOD TRUE-UP ADJ. NOT APPLICABLE TO THIS PERIOD | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,333 | 1,335 | 15,998 |
| 5. | CONSERVATION REVENUE APPLICABLE | 16,806 | 14,984 | 13,628 | 12,671 | 12,926 | 16,161 | 17,697 | 17,429 | 16,680 | 14,911 | 13,429 | 14,404 | 181,726 |
| 6. | CONSERVATION EXPENSES (FROM CT-3, PAGE 1, LINE 23) | 19,415 | 15,378 | 20,129 | 16,060 | 20,159 | 22,254 | 19,475 | 21,648 | 1,946 | 16,826 | 15,276 | 23,494 | 212,060 |
| 7. | TRUE-UP THIS PERIOD (LINE 5 - 6) | (2,609) | (394) | (6,501) | (3,389) | (7,233) | (6,093) | (1,778) | (4,219) | 14,734 | (1,915) | (1,847) | (9,090) | (30,334) |
| 8, | INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10) | 12 | 9 | 5 | 0 | (6) | (14) | (23) | (31) | (28) | (23) | (32) | (48) | (179) |
| 9. | TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH | 15,998 | 12,068 | 10,350 | 2,521 | (2,201) | (10,773) | (18,213) | (21,347) | (26,930) | (13,557) | (16,828) | (20,040) | 15,998 |
| 9A. | DEFERRED TRUE-UP BEGINNING OF PERIOD | | | | | | | | | | | | | |
| 10. | PRIOR TRUE-UP COLLECTED (REFUNDED) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,333) | (1,335) | (15,998) |
| 11. | TOTAL NET TRUE-UP (LINES 7+8+9+9A+10) | 12,068 | 10,350 | 2,521 | (2,201) | (10,773) | (18,213) | (21,347) | (26,930) | (13,557) | (16,828) | (20,040) | (30,513) | (30.513) |

EXHIBIT NO. DOCKET NO. 050002-EG FLORIDA PUBLIC UTILITIES COMPANY (RLS-1) PAGE 6 OF 36

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - MARIANNA

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-04 THROUGH December-04

| c. | INTEREST PROVISION | JANUARY | FEBRUARY | MARCH | APRIL | MAY | JUNE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | TOTAL |
|-----|---|---------|----------|--------|---------|----------|----------|----------|----------|-----------|----------|----------|----------|----------|
| 1. | BEGINNING TRUE-UP (LINE B-9) | 15,998 | 12,068 | 10,350 | 2,521 | (2,201) | (10,773) | (18,213) | (21,347) | (26,930) | (13,557) | (16,828) | (20,040) | 15,998 |
| 2. | ENDING TRUE-UP BEFORE INTEREST (LINES B7+B9+B9A+B10) | 12,056 | 10,341 | 2,516 | (2,201) | (10,767) | (18,199) | (21,324) | (26,899) | (13,529) | (16,805) | (20,008) | (30,465) | (30,334) |
| 3. | TOTAL BEG. AND ENDING TRUE-UP | 28,054 | 22,409 | 12,866 | 320 | (12,968) | (28,972) | (39,537) | (48,246) | (40,459) | (30,362) | (36,836) | (50,505) | (14,336) |
| 4. | AVERAGE TRUE-UP (LINE C-3 X 50%) | 14,027 | 11,205 | 6,433 | 160 | (6,484) | (14,486) | (19,769) | (24,123) | (20,230) | (15,181) | (18,418) | (25,253) | (7,168) |
| 5. | INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH | 1.06% | 1.03% | 0.98% | 0.98% | 1.03% | 1.04% | 1.33% | 1.47% | 1.60% | 1.77% | 1.94% | 2.22% | |
| 6. | INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH | 1.03% | 0.98% | 0.98% | 1.03% | 1.04% | 1.33% | 1.47% | 1.60% | 1.77% | 1.94% | 2.22% | 2.34% | |
| 7. | TOTAL (LINE C-5 + C-6) | 2.09% | 2.01% | 1.96% | 2.01% | 2.07% | 2.37% | 2.80% | 3.07% | 3.37% | 3.71% | 4.16% | 4.56% | |
| 8. | AVG. INTEREST RATE (C-7 X 50%) | 1.05% | 1.01% | 0.98% | 1.01% | 1.04% | 1.19% | 1.40% | 1.54% | 1.69% | 1.86% | 2.08% | 2.28% | |
| 9. | MONTHLY AVERAGE INTEREST RATE | 0.087% | 0.084% | 0.082% | 0.084% | 0.086% | 0.099% | 0.117% | 0.128% | 0.140% | 0.155% | 0.173% | 0.190% | |
| 10. | INTEREST PROVISION (LINE C-4 X C-9) | 12 | 9 | . 5 | 0 | (6) | (14) | (23) | (31) | (28) | (23) | (32) | (48) | (179) |

EXHIBIT NO. DOCKET NO. 050002-EG FLORIDA PUBLIC UTILITIES COMPANY (RLS-1) PAGE 7 OF 36

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - FERNANDINA

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

FOR MONTHS January-04 THROUGH December-04

| Α. | CONSERVATION EXPENSE BY PROGRAM | JANUARY | FEBRUARY | MARCH | APRIL | MAY | JUŅE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | TOTAL |
|----------------------------|---|------------------------|--------------------------|---------------------|--------------------------|--------------------------|--------------------------|--------------------------|---------------------|--------------------------|------------------|--------------------------|----------------------|----------------------------|
| 1. 2. 3. 4. 5. | | | | | | | | | | | | | | 0 0 0 0 |
| 6. 7. 8. 9. | Common | 6,384 | 6,873 | 3,329 | 2,332 | 12,322 | 2,974 | 6,928 | 4,624 | (6,454) | 5,900 | 7,546 | 4,518 | 0 0 0 57,276 |
| 11. 12. 13. | Residential Geothermal Heat Pump GoodCents Home/Energy Star GoodCents Energy Survey Program | 0 6,821 591 C | 0 1,899 2,283 0 | 0 1,688 4,370 | 0 3,723 5,956 0 | 0 2,302 2,348 0 | 0 4,009 6,694 0 | 0 3,397 4,699 0 | 3,799 4,509 | 0 2,533 5,816 0 | (2,092) 2,511 | (2,009) 1,800 (11) | 3,623 10,910 0 | 0 29,693 52,487 7 |
| 15. 16. 17. 18. | GoodCents Commercial Building GoodCents Commercial Tech. Assistance Low Income | 0 104 0 | 931 6,257 0 0 | 1,043 1,192 0 | 1,037 1,284 0 | 954 1,557 0 | 978 3,381 0 | 1,134 1,248 0 | 1,022 1,271 0 | 1,254 1,232 0 | 853 63 0 | 850 1,100 0 | 1,118 1,118 0 | 11,174 19,807 0 |
| 19 20, | | 0 | 0 | 0 | ō | ō | 0 | 0 | 0 | 0 | ŏ | 0 | 0 | 0 |
| 21, 22. | | 13,900 | 18,243 | 11,622 | 14,332 | 19,483 | 18,036 | 17,406 | 15,225 | 4,381 | 7,253 | 9,276 | 21,287 | 170,444 |
| 23. | RECOVERABLE CONSERVATION EXPENSES | 13,900 | 18,243 | 11,622 | 14,332 | 19,483 | 18,036 | 17,406 | 15,225 | 4,381 | 7,253 | 9,276 | 21,287 | 170,444 |

(RLS-1) PAGE 23 OF 36

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - FERNANDINA

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-04 THROUGH December-04

| В | . CONSERVATION REVENUES | JANUARY | FEBRUARY | MARCH_ | APRIL | MAY | JUNE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | TOTAL |
|-----|--|----------|----------|---------|---------|---------|---------|-------------|---------|-----------|---------|----------|----------|----------|
| 1. | RESIDENTIAL CONSERVATION | | | | | | | | | | | | | 0 |
| 2. | CONSERVATION ADJ. REVENUES | 19,423 | 18,730 | 19,542 | 16,822 | 16,750 | 22,872 | 23,538 | 23,040 | 21,492 | 22,842 | 18,555 | 16,822 | 240,428 |
| 3. | TOTAL REVENUES | 19,423 | 18,730 | 19,542 | 16,822 | 16,750 | 22,872 | 23,538 | 23,040 | 21,492 | 22,842 | 18,555 | 16,822 | 240,428 |
| 4. | PRIOR PERIOD TRUE-UP ADJ. NOT APPLICABLE TO THIS PERIOD | 7,545 | 7,545 | 7,545 | 7,545 | 7,545 | 7,545 | 7,545 | 7,545 | 7,545_ | 7,545 | 7,545 | 7,544 | 90,539 |
| 5. | CONSERVATION REVENUE APPLICABLE | 26,968 | 26,275 | 27,087 | 24,367 | 24,295 | 30,417 | 31,083 | 30,585 | 29,037 | 30,387 | 26,100 | 24,366 | 330,967 |
| 6. | CONSERVATION EXPENSES (FROM CT-3, 4 PAGE 1, LINE 23) | 13,900 | 18,243 | 11,622 | 14,332 | 19,483 | 18,036 | 17,406 | 15,225 | 4,381 | 7,253 | 9,276 | 21,287 | 170,444 |
| 7. | TRUE-UP THIS PERIOD (LINE 5 - 6) | 13,068 | 8,032 | 15,465 | 10,035 | 4,812 | 12,381 | 13,677 | 15,360 | 24,656 | 23,134 | 16,824 | 3,079 | 160,523 |
| 8. | INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10) | 81 | 81 | 82 | 89 | 91 | 106 | 13 1 | 153 | 186 | 230 | 280 | 312 | 1,822 |
| 9. | TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH | 90,539 | 96,143 | 96,711 | 104,713 | 107,292 | 104,650 | 109,592 | 115,855 | 123,823 | 141,120 | 156,939 | 166,498 | 90,539 |
| 9A. | DEFERRED TRUE-UP BEGINNING OF PERIOD | | | | | | | | | | | | | |
| 10. | PRIOR TRUE-UP COLLECTED (REFUNDED) | (7,545). | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,545) | (7,544) | (90,539) |
| 11. | TOTAL NET TRUE-UP (LINES 7+8+9+9A+10) | 96,143 | 96,711 | 104,713 | 107,292 | 104,650 | 109,592 | 115,855 | 123,823 | 141,120 | 156,939 | 166,498 | 162,345 | 162,345 |

EXHIBIT NO. DOCKET NO. 040002-EG FLORIDA PUBLIC UTILITIES COMPANY (RLS-1) PAGE 24 OF 36

SCHEDULE CT-3 PAGE 3 OF 3

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY - FERNANDINA

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-04 THROUGH December-04

| С | . INTEREST PROVISION | JANUARY_ | FEBRUARY | MARCH | APRIL | MAY | JUNE | JULY | AUGUST | SEPTEMBER | OCTOBER | NOVEMBER | DECEMBER | TOTAL |
|-----|---|----------|----------|-----------|---------|---------|---------|---------|---------|-----------|---------|----------|----------|---------|
| 1. | BEGINNING TRUE-UP (LINE B-9) | 90,539 | 96,143 | 96,711 | 104,713 | 107,292 | 104,650 | 109,592 | 115,855 | 123,823 | 141,120 | 156,939 | 166,498 | 90,539 |
| 2. | ENDING TRUE-UP BEFORE INTEREST (LINES B7+B9+B9A+B10) | 96,062 | 96,630 | 104,631 | 107,203 | 104,559 | 109,486 | 115,724 | 123,670 | 140,934 | 156,709 | 166,218 | 162,033 | 160,523 |
| 3. | TOTAL BEG. AND ENDING TRUE-UP | 186,601 | 192,773 | 201,342 | 211,916 | 211,851 | 214,136 | 225,316 | 239,525 | 264,757 | 297,829 | 323,157 | 328,531 | 251,062 |
| 4. | AVERAGE TRUE-UP (LINE C-3 X 50%) | 93,301 | 96,387 | 100,671 | 105,958 | 105,926 | 107,068 | 112,658 | 119,763 | 132,379 | 148,915 | 161,579 | 164,266 | 125,531 |
| 5. | INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH | 1.06% | 1.03% | 0.98% | 0.98% | 1.03% | 1.04% | 1.33% | 1.47% | 1.60% | 1.77% | 1.94% | 2.22% | |
| 6. | INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH | 1.03% | 0.98% | 0.98% | 1.03% | 1.04% | 1,33% | 1.47% | 1.60% | 1.77% | 1.94% | 2.22% | 2.34% | |
| 7. | TOTAL (LINE C-5 + C-6) | 2.09% | 2.01% | 1.96% | 2.01% | 2.07% | 2.37% | 2.80% | 3.07% | 3.37% | 3.71% | 4.16% | 4.56% | |
| 8. | AVG. INTEREST RATE (C-7 X 50%) | 1.05% | 1.01% | 0.98% | 1.01% | 1.04% | 1.19% | 1.40% | 1.54% | 1.69% | 1.86% | 2.08% | 2.28% | |
| 9. | MONTHLY AVERAGE INTEREST RATE | 0.087% | 0.084% | 0.082% | 0.084% | 0.086% | 0.099% | 0.117% | 0.128% | 0.140% | 0.155% | 0.173% | 0.190% | |
| 10. | INTEREST PROVISION (LINE C-4 X C-9) | 81 | 81 | <u>82</u> | 89 | 91 | 106 | 131 | 153 | 186 | 230 | 280 | 312 | 1,822 |

EXHIBIT NO. DOCKET NO. 040002-EG
FLORIDA PUBLIC UTILITIES COMPANY (RLS-1)
PAGE 25 OF 36