

**REDACTED**

1 *Privileged and Confidential*

2  
3 Responses to Question 4

4  
5 *Q: What percentage of FCG total load does the Miami/Dade load subject to this contract represent?*

6  
7 **A: The percentage of FCG total load Miami Dade contract represents is [REDACTED].**

8  
9 *Q: What is the potential new load associated with the six EMD engines?*

10  
11 **A: The potential new load associated with the six EMD engines is [REDACTED] CFH.**

12  
13 *Q: What would it cost Miami/Dade to bypass FCG and connect directly to FGT?*

14  
15 **A: FCG does not have this information.**

16  
17 *Q: What is the dollar amount that of fixed costs would be collected from the other ratepayers if*  
18 *Miami/Dade did bypass FCG?*

19  
20 **A: The amount of fixed costs that would be collected from the other ratepayers if Miami-**  
21 **Dade bypasses FCG is \$ [REDACTED], annually.**

22  
23 *Q: Wouldn't the loss of Miami/Dade reduce costs to the remainder of the ratepayers by the amount*  
24 *currently collected through the CRA?*

25  
26 **A: The loss of Miami-Dade would reduce the costs to the remainder of the ratepayers by**  
27 **\$ [REDACTED] the amount currently collected through the CRA recovery factor, but this**  
28 **reduction would be offset by the amount of \$ [REDACTED] that would have to be collected from**  
29 **the rest of the ratepayers if FCG loses this customer.**

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31  
32 Attachment 1

33  
34 *Q: How were the numbers in column 2 derived?*

35  
36 **A: The numbers in column 2 were from the original cost analysis of NUI, the numbers in**  
37 **column 3 were derived by applying the customer cost allocation factor in FPSC Order PSC-**  
38 **04-0128-PAA-GU, Docket No. 030569-GU, for the GS-1250K customer class to FCG's**  
39 **annual expenses. See attached excerpt.**

40  
41 *Q: Does the last column represent the system average cost or the average cost to serve commercial*  
42 *industrial customers similar to Miami/Dade?*

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1           **A: The last column represents the average cost to serve commercial/industrial customers**  
2           **similar to Miami-Dade, calculated under the formula approved for Miami Dade's rate class**  
3           **in our last rate case.**  
4

5           *Q: Why is the cost for the Alexander Orr plant less (on a percentage basis of the 'surveillance report'*  
6           *number) than the Hialeah plant?*  
7

8           **A: The original investment of \$833,239 to serve the Hialeah plant was higher than the**  
9           **investment of \$387,250 to serve the Alexander Orr plant causing a higher requirement for**  
10           **return on investments.**  
11

12  
13           *Q: Provide FCG's total customer count and number of commercial/industrial customers.*  
14

15           **A: The total number of FCG customers is 102,736. Total FCG commercial/industrial**  
16           **customers is 6,198. Miami-Dade counts as a total of 3 commercial/industrial customers,**  
17           **with two active services at the Alexander Orr facility and one service at the Hialeah plant.**  
18

19           *Q: Of total FCG commercial/industrial customer load, what percentage does Miami-Dade represent?*  
20

21           **A: Based on 2008, January – November information, Miami-Dade MACQ represents ██████%**  
22           **of FCG system load and ██████% of commercial/industrial customer load.**  
23

24           *Q: Provide FCG's estimate of Miami-Dade's cost to bypass FCG services.*  
25

26           **A: FCG estimates that Miami-Dade's cost to by-pass FCG services will be approximately**  
27           **\$████████ for the Alexander Orr plant; \$████████ for the Hialeah plant; and \$████████**  
28           **for the Black Point plant.**