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STATE OF FLORIDA



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Public Service Commission

August 25, 2017

THIRD STAFF DATA REQUEST
bkeating@gunster.com

Beth Keating, Esq.
Gunster Law Firm
215 South Monroe Street
Suite 601
Tallahassee, Florida 32301

Re: Docket No. 20170150-EI- Petition for limited proceeding to include reliability and modernization projects in rate base by Florida Public Utilities Company.

Dear Ms. Keating:

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC) provide responses to the following data requests:

1. Please refer to Florida Public Utilities Company's (FPUC) Responses to Staff's First Data Request, in Docket No. 20170150-EI, Nos. 1 and 4, as well as Attachment A (Excel file) submitted with these responses.

a. Please identify the Florida Public Service Commission (FPSC) Order authorizing the annual depreciation rate of 4.4% associated with account "[b]attery [s]torage (363)," shown in cell D100.

b. FPSC Rule 25-6.0142(3), Florida Administrative Code (F.A.C.), requires that: "[t]he Director of the Division of Economics, Florida Public Service Commission, shall be notified annually of additions and subdivisions to the utility's retirement unit List with explanations of the nature and justification." Has FPUC filed such an update detailing the addition of battery storage equipment investments (that are included for recovery in the Company's petition in this docket) to any of its pre-existing Federal Energy Regulatory Commission Accounts that are listed on FPSC Order No. PSC-15-0575-PAA-EI?¹

c. Please confirm that the total investment amount associated with "[b]attery [s]torage (363)," shown in cell AH77, is included in the 2017 total Jurisdictional Per Books Plant

¹ Order No. PSC-15-0575-PAA-EI, issued December 21, 2015, in Docket No. 150162-EI, *In re: Petition for approval of 2015 depreciation study by Florida Public Utilities Company.*

in Service amount (\$10,679,670) found in the Direct Testimony of FPUC Witness Cassel, Exhibit MDC-1, Page 2 of 7, Line 3, Column 1.

d. Please confirm that the Accumulated Depreciation amount associated with “[b]attery [s]torage (363),” shown in cell AH81 is included in the 2017 total Accumulated Provision for Depreciation and Amortization amount (negative \$209,778) found in the Direct Testimony of FPUC Witness Cassel, Exhibit MDC-1, Page 2 of 7, Line 3, Column 2.

e. Please confirm that the depreciation expense amount associated with “[b]attery [s]torage (363),” found in cell AH116, is included in the 2017 Adjusted Jurisdictional Amount (\$461,353) found in FPUC Witness Cassel’s Exhibit MDC-1, Page 4 of 7, Line 11, column 7.

f. Please explain why the expense amount contained in cell AH106, for account “Structures (352)” is a negative \$11,612.

Please file all responses electronically no later than Thursday, September 7, 2017, on the Commission’s website at www.floridapsc.com by selecting the Clerk’s Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6218 if you have any questions.

Sincerely,

s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr

cc: Office of Commission Clerk
Office of Public Counsel (C. Rehwinkel, P. Christensen)