

FILED 5/15/2018 DOCUMENT NO. 03695-2018 FPSC - COMMISSION CLERK

(850) 850-521-1708 bkeating@gunster.com

May 15, 2018

E-PORTAL FILING

Ms. Carlotta Stauffer, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: DOCKET NO. 20180061-EI - Petition for limited proceeding to recover incremental storm restoration costs by Florida Public Utilities Company.

Dear Ms. Stauffer:

Attached, please find the Notice of Service for <u>Florida Public Utilities Company's Responses to Staff's 2nd Data Request.</u>

As always, please don't hesitate to let me know if you have any questions. Thank you for your assistance with this filing.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 S. Monroe Street, Suite 601 Tallahassee, Florida 32301

Telephone: (850) 521-1706 Facsimile: (850) 576-0902

Attorneys for Florida Public Utilities Company

cc:/ (Service List)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Limited Proceeding to DOCKET NO. 20180061-EI Recover Incremental Storm Restoration Costs by Florida Public Utilities.

DATED: May 15, 2018

NOTICE OF SERVICE OF FLORIDA PUBLIC UTILITIES COMPANY'S RESPONSES TO STAFF'S 2ND DATA REQUESTS

NOTICE IS HEREBY GIVEN that Florida Public Utilities Company ("FPUC"), by and through its undersigned counsel, has served its Responses to Staff's 2nd Data Requests to J.R. Kelly and Virginia Ponder, Office of the Public Counsel, 111 West Madison Street, Room 812, Tallahassee, Florida 32399-1400, at Kelly.jr@leg.state.fl.us, Ponder. Virginia@leg.state.fl.us, this May 15, 2018.

Beth Keating

Gunster, Yoakley &

Stewart, P.A. 215 S.

Monroe Street, Suite 601 Tallahassee, Florida 32301

Telephone: (850) 521-1706

Facsimile: (850) 576-0902

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Notice of Service of Responses of Florida Public Utilities to Staff's 2nd Data Request in the referenced docket have been served by Electronic Mail this 15th day of May, 2018, upon the following:

J.R. Kelly/Virginia Ponder Office of the Public Counsel c/o The Florida Legislature 111 West Madison St., Rm 812 Tallahassee, FL 32399-1400 Kelly.jr@leg.state.fl.us Ponder.Virginia@leg.state.fl.us

Jennifer Crawford Florida Public Service Commission General Counsel's Office 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850 jcrawfor@psc.state.fl.us

Beth Keating

Gunster, Yoakley &

Stewart, P.A. 215 S.

Monroe Street, Suite 601

Tallahassee, Florida 32301

Telephone: (850) 521-1706

Facsimile: (850) 576-0902

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition for Limited Proceeding to DOCKET NO. 20180061-EI Recover Incremental Storm Restoration Costs by Florida Public Utilities Company.

FLORIDA PUBLIC UTILITIES COMPANY'S RESPONSES TO STAFF'S 2^{ND} DATA REQUEST

Florida Public Utilities Company ("FPUC" or "Company") hereby submits its Responses to Staff's 2nd Data Requests served on the Company on May 4, 2018. The individual responses follow this cover sheet.

Respectfully submitted this 15th day of May, 2018, by:

Beth Keating, Esquire

Florida Bar No. 0022756

Gunster Law Firm 215 South Monroe Street Suite 601 Tallahassee, FL 32301 (850) 521-1706

Please refer to pages 2 and 3, paragraphs 6 through 9, of the petition. FPUC provides details, i.e. dates, number of outages, what division was affected, for Hurricanes Matthew and Irma. Please provide this same information for Hurricane Hermine.

Company Response:

Mobilization began for Hurricane Hermine on September 13, 2016. The storm began on September 14, and all customers were restored by September 15. There were 48 outages in the Northwest division and 10,733 in the Northeast Division.

 Please refer to page 4, paragraphs 11 and 12, of the petition. FPUC provides a breakdown of the costs related to Hurricanes Matthew and Irma. Please provide the same breakdown of costs related to Hurricane Hermine.

Company Response:

The costs for Hurricane Hermine follow:

Type Cost	Northwest		Northeast	
Inventory	\$	35	\$	642
Outside Contractor	\$	1,642		
Logistics			\$	134
Employee Expenses	\$	20		
Paryoll & Overhead	\$	9,948	\$	14,938
	\$	11,645	\$	15,714

3) Please refer to page 4, paragraph 13, page 5, paragraph 14, and Attachment A, page 1. FPUC proposed to restore its storm reserve to \$1,500,000, which is the amount reflected in the 2017 Agreement. However, FPUC determined that neither agreement has an impact on this Petition. Please explain why FPUC is proposing to replenish its storm reserve to the amount in the 2017 Agreement and not the 2014 Agreement.

Company Response:

The storm replenishment amount of \$1,500,000 represents the pre Hurricane Irma reserve balance. The Company's selection of that amount represents a level that was consistent with the language in Section IV of the 2017 Settlement Agreement.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT TRUE AND CORRECT COPIES OF THE FOREGOING Responses of Florida Public Utilities Company to Staff's 2nd Data Request to the Company in Docket No. 20180061-EI have been served by electronic mail this 15th day of May, 2018, upon the following:

Jennifer Crawford
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
jcrawfor@psc.state.fl.us

J.R. Kelly / Virginia Ponder
Office of Public Counsel
c/o The Florida Legislature
111 W. Madison Street, Room 812
Tallahassee, FL 32399-1400
Kelly.jr@leg.state.fl.us
Ponder.Virginia@leg.state.fl.us

Beth Keating, Esquire Florida Bar No. 0022756

Gunster Law Firm 215 South Monroe Street Suite 601 Tallahassee, FL 32301 (850) 521-1706