

COMMISSIONERS:  
ART GRAHAM, CHAIRMAN  
JULIE I. BROWN  
DONALD J. POLMANN  
GARY F. CLARK  
ANDREW GILES FAY

STATE OF FLORIDA



DIVISION OF ECONOMICS  
JUDY HARLOW  
DIRECTOR  
(850) 413-6842

# Public Service Commission

October 2, 2018

Beth Keating, Esq.  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe Street, Suite 601  
Tallahassee, Florida 32301-1839

## STAFF'S SECOND DATA REQUEST

RE: Docket No. 20180163 - Joint Petition for Approval of GRIP Cost Recovery Factors by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation

Dear Ms. Keating:

By this letter, Commission staff requests the following information from Florida Public Utilities Company (FPUC), Florida Public Utilities Company-Fort Meade (Fort Meade), and Florida Division of Chesapeake Utilities Corporation (Chesapeake).

1. Please provide the total amount of depreciation and/or operations and maintenance (O&M) expense savings, if any, that were included as a reduction in expenses for FPUC, Fort Meade, and Chesapeake. If there were no depreciation or O&M expense savings, please explain why.
2. Please briefly describe the planned pipe replacement projects for FPUC, Fort Meade, and Chesapeake in 2019.
3. Referring to Attachment A provided in response to staff's first data request, please explain the delay (through 2019) for Fort Meade's pipe replacement program progress. The response to question one (1) in staff's first data request in Docket No. 20170190-GU showed that all remaining steel services would be replaced in the years 2016-2018.
4. The direct testimony of Witness Cassel filed in Docket No. 20180051-GU (FPUC), page 7, lines 3-9, states that \$1,040,141 in 2018 GRIP tax savings will be flowed back to the customers by incorporating it as an over-recovery in the 2019 GRIP projection. The GRIP filing in Docket No. 20180163-GU, however, shows in Attachment B, for demonstrative purposes only, what the GRIP schedules and resulting GRIP factors would be, including the \$1,040,141 in 2018 Tax Savings Refund. The proposed GRIP schedules and GRIP factors do not appear to include the \$1,040,141 in 2018 Tax Savings Refund. Please explain if the \$1,040,141 in 2018 GRIP tax savings is included in FPUC's 2019

GRIP factors. If not, please explain the inconsistency with the testimony filed in Docket No. 20180051-GU.

5. Similar to previous question, the direct testimony of Witness Cassel filed in Docket No. 20180054-GU (Chesapeake), pages 6-7, states that the \$324,362 in 2018 GRIP tax savings will also be flowed back to customers by incorporating it as an over-recovery of the 2019 GRIP projection. The proposed GRIP schedules and GRIP factors also do not appear to include the \$324,362 in 2018 Tax Savings Refund. Please explain if the \$324,362 in 2018 GRIP tax savings is included in Chesapeake's 2019 GRIP factors. If not, please explain the inconsistency with the testimony filed in Docket No. 20180054-GU.

Please file all responses electronically no later than Tuesday, October 9, 2018, via the Commissions website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's office tab and Electronic Filing Web Form. Feel free to call me at 850-413-6495 if you have any questions.

Sincerely,

*/s/ Henry Merryday*  
Public Utility Analyst I  
[hmerryda@psc.state.fl.us](mailto:hmerryda@psc.state.fl.us)

LED/

cc: Office of Commission Clerk  
Office of Public Counsel