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# Public Service Commission

July 9, 2019

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

VIA E-MAIL  
bkeating@gunster.com

Re: Docket No. 20190132-EI - Petition for authority for approval of non-firm energy pilot program and tariff 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 discuss what prompted the filing of this petition, i.e., request from the two GSLD-1 customers.
2. In the past 3 years, how often have Rayonier & Westrock requested additional power from FPUC, in addition to what they produce themselves?
3. The petition states that there are two customers that would benefit from this Pilot Program, but the tariff states there is availability for three customers. How will the company determine the third customer?
4. Please explain how this pilot program will be revenue neutral to the company.
5. Please refer to the proposed tariff sheet No. 67, subsection Monthly Rate. Please provide cost support for the \$500.00 monthly NF administrative charge.
6. Please refer to the proposed tariff sheet No. 67, subsection Applicability and provide the Special Contracts that are referred to in the first sentence; in the alternative, provide the docket numbers that approved those contracts.

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7. Please state whether FPUC's cost to purchase non-firm energy from FPL for the two GSLD-1 customers under the proposed tariff, and any revenues received from the two GSLD-1 customers under the proposed tariff, will be included in FPUC's Purchased Power Cost Recovery filings in Docket No. 20190001-EI.
8. Please provide a copy of FPL's TS-1 tariff.
9. Will the non-firm (NF) energy price, charged by FPUC to the customers taking service under the proposed tariff, be at the same rate as FPUC purchases non-firm energy from FPL in accordance with FPL's TS-1 tariff? If not, please explain any "mark-up" to the NF energy price FPUC would charge to the customers
10. Referring to Paragraph 9(b) of the petition, please explain how the overall load factor of the energy usage on Amelia Island will be improved by the proposed tariff and how that impacts the general body of FPUC's ratepayers.
11. Please discuss how FPUC will determine the success or failure of this pilot program.
12. When would FPUC petition the Commission to continue, modify, and discontinue the proposed tariff?

Please file all responses electronically no later than July 23, 2019, from the Commission's website at [www.floridapsc.com](http://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 S. Brownless*

Suzanne S. Brownless  
Special Counsel

SSB

cc: Office of Commission Clerk  
Florida Public Utilities Company (Cassel)