

Writer's E-Mail Address: bkeating@gunster.com

September 3, 2020

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850


Re: Docket No. 20190156-EI - Petition for a limited proceeding to recover incremental storm restoration costs, capital costs, revenue reduction for permanently lost customers, and regulatory assets related to Hurricane Michael, by Florida Public Utilities Company.

Dear Mr. Teitzman:

Attached for electronic filing, please find FPUC's response to Staff's First Data Request regarding the proposed Settlement and Stipulation.

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

Sincerely,


Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

MEK

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for a limited proceeding to recover incremental storm restoration costs, capital costs, revenue reduction for permanently lost customers, and regulatory assets related to Hurricane Michael, by Florida Public Utilities Company.

DOCKET NO. 20190156-EI

In re: Petition for establishment of regulatory assets for expenses not recovered during restoration for Hurricane Michael, by Florida Public Utilities Company.

DOCKET NO. 20190155-EI

In re: Petition for approval of 2019 depreciation study by Florida Public Utilities Company.

DOCKET NO. 20190174-EI

DATED: September 3, 2020

FPUC'S RESPONSE TO STAFF'S FIRST SETTLEMENT DATA REQUEST

1. Please refer to FPUC and OPC's Stipulation and Settlement (SS), paragraph I.5, filed on August 31, 2020, and the Direct Testimony of FPUC Witness Lee, Exhibit PSL-1, filed on May 8, 2020, Schedules 1 – 4. Please provide revised Schedules 1 – 4 that reflect what FPUC and OPC agreed upon and discussed in paragraph I.5 of the SS.

Company Response:

See Attached File Settlement Sch 1 to 4. Please note that for accounts 371, 373 and 392.4 are different from OPC's response to staff but agree to OPC Witness Garrett.

FLORIDA PUBLIC UTILITIES
2019 CONSOLIDATED ELECTRIC DIVISIONS
COMPARISON OF CURRENT AND PROPOSED DEPRECIATION RATES

ACCOUNT	CURRENT		CURRENT					SETTLEMENT PROPOSED - EFFECTIVE DATE 1/1/2020				
	1/1/2020 INVESTMENT	1/1/2020 RESERVE	AVERAGE SERVICE LIFE (YRS.)	AVERAGE REMAINING LIFE (YRS.)	NET SALVAGE (%)	AGE (YRS.)	CURVE	AVERAGE SERVICE LIFE (YRS.)	AVERAGE REMAINING LIFE (YRS.)	NET SALVAGE (%)	(Sch. L) AGE (YRS.)	CURVE
TRANSMISSION PLANT												
350.1 - Land Rights	\$0	\$0	70.0	26.0	0.0	44.2	SQ	75.0	75.0	0.0	0.0	SQ
352 - Structures and Improvements	\$1,919,496	\$59,504	55.0	50.0	0.0	5.2	S5	60.0	57.0	0.0	3.2	S5
353 - Station Equipment	\$7,581,692	\$1,623,570	40.0	27.0	5.0	13.4	S2	53.0	43.0	0.0	10.2	S3
354 - Towers and Fixtures	\$249,798	\$197,091	55.0	14.5	(15.0)	40.5	S6	60.0	19.0	(15.0)	41.0	S6
355 - Poles and Fixtures	\$1,659,809	\$487,283	40.0	16.9	(40.0)	23.2	R5	50.0	26.7	(50.0)	23.0	R4
355.1 - Poles and Fixtures - Concrete	\$4,014,730	\$678,489	45.0	41.0	(30.0)	4.5	R4	56.0	50.2	(30.0)	5.8	R4
356 - Overhead Conductors and Devices	\$3,674,653	\$563,667	50.0	36.0	(20.0)	14.1	S2	55.0	46.0	(20.0)	9.2	S2
359 - Roads and Trails	\$6,788	\$6,009	65.0	12.5	0.0	52.5	SQ	70.0	12.5	0.0	57.5	SQ
Total Transmission Assets	\$19,106,966	\$3,615,614										
DISTRIBUTION PLANT												
360.1 - Land Rights	\$56,995	\$34,100	60.0	31.0	0.0	29.5	SQ	60.0	26.0	0.0	34.5	SQ
361 - Structures and Improvements	\$1,198,983	\$108,223	60.0	47.0	(5.0)	13.0	SQ	60.0	54.0	(5.0)	5.6	SQ
362 - Station Equipment	\$13,235,887	\$3,869,925	45.0	34.0	(10.0)	11.2	S3	55.0	42.6	(10.0)	11.9	S3
364 - Poles, Towers, and Fixtures	\$25,869,789	\$9,265,961	38.0	24.0	(45.0)	14.4	R4	44.0	33.6	(50.0)	10.2	R4
365 - Overhead Conductors & Devices	\$20,427,593	\$10,443,893	40.0	21.0	(35.0)	19.3	R5	45.0	30.0	(35.0)	15.1	R5
366 - Underground Conduit	\$7,034,164	\$1,359,793	60.0	50.0	(5.0)	10.4	R5	64.0	51.3	(5.0)	12.6	R5
367 - Underground Conductors & Devices	\$10,218,344	\$3,955,509	35.0	23.0	(5.0)	12.2	R4	47.0	32.6	(5.0)	13.9	R4
368 - Line Transformers	\$22,458,863	\$15,095,313	30.0	12.4	(20.0)	17.7	S4	36.0	19.7	(20.0)	16.5	S4
369 - Services	\$14,341,344	\$8,198,131	37.0	19.9	(35.0)	17.1	R5	48.0	32.4	(40.0)	15.4	R5
370 - Meters	\$5,085,099	\$3,085,554	30.0	11.9	(10.0)	18.2	R5	30.0	13.0	(10.0)	17.0	R5
371 - Installation on Customers' Premises	\$3,263,292	\$1,784,044	20.0	9.6	10.0	10.7	S3	25.0	13.6	5.0	11.6	S3
373 - Street Lighting & Signal Systems	\$2,725,584	\$1,441,996	22.0	7.6	(10.0)	16.6	R3	22.0	11.4	(10.0)	11.5	R3
Total Distribution Assets	\$125,915,937	\$58,642,442										
GENERAL PLANT												
390 - Structures & Improvements	\$4,044,796	\$1,006,938	50.0	41.0	0.0	9.0	R4	50.0	38.0	0.0	12.7	R4
392.1 - Transportation-Cars	\$23,951	\$10,768	7.0	6.0	15.0	1.0	S2	11.0	5.2	15.0	6.5	S2
392.2 - Transportation-Light Trucks & Vans	\$1,041,834	\$575,092	9.0	4.9	12.0	4.1	S4	11.0	4.1	12.0	7.0	S4
392.3 - Transportation - Heavy Trucks	\$3,755,922	\$2,005,662	13.0	6.4	10.0	6.8	S3	15.0	6.1	10.0	9.4	S3
392.4 - Transportation - Trailers	\$144,084	\$94,053	25.0	13.8	5.0	11.4	R4	25.0	9.4	5.0	16.4	R4
396 - Power Operated Equipment	\$898,523	\$335,752	25.0	8.4	0.0	16.6	S6	25.0	15.4	0.0	9.6	S6
Total General Plant Assets	\$9,909,111	\$4,028,265										
GRAND TOTAL	154,932,014	66,286,321										

* Reflects Settlement Terms

FLORIDA PUBLIC UTILITIES
2019 CONSOLIDATED ELECTRIC DIVISIONS
COMPARISON OF CURRENT AND PROPOSED DEPRECIATION COMPONENTS

ACCOUNT	CURRENT EFFECTIVE 1/1/2015			SETTLEMENT PROPOSED - EFFECTIVE DATE 1/1/2020			
	AVERAGE REMAINING LIFE (YRS.)	NET SALVAGE (%)	REMAINING LIFE RATE (%)	AVERAGE REMAINING LIFE (YRS.)	NET SALVAGE (%)	1/1/2020 RESERVE (%)	REMAINING LIFE RATE (%)
TRANSMISSION PLANT							
350.1 - Land Rights	26.0	0.0	1.4	75.0	0.0	0.00	1.3
352 - Structures and Improvements	50.0	0.0	1.8	57.0	0.0	3.10	1.7
353 - Station Equipment	27.0	5.0	2.6	43.0	0.0	21.41	1.8
354 - Towers and Fixtures	14.5	(15.0)	2.1	19.0	(15.0)	78.90	1.9
355 - Poles and Fixtures	16.9	(40.0)	4.1	26.7	(50.0)	29.36	4.5
355.1 - Poles and Fixtures - Concrete	41.0	(30.0)	2.9	50.2	(30.0)	16.90	2.3
356 - Overhead Conductors and Devices	36.0	(20.0)	2.5	46.0	(20.0)	15.34	2.3
359 - Roads and Trails	12.5	0.0	1.5	12.5	0.0	88.52	0.9
DISTRIBUTION PLANT							
360.1 - Land Rights	31.0	0.0	1.6	26.0	0.0	59.83	1.5
361 - Structures and Improvements	47.0	(5.0)	1.7	54.0	(5.0)	9.03	1.8
362 - Station Equipment	34.0	(10.0)	2.4	42.6	(10.0)	29.24	1.9
364 - Poles, Towers, and Fixtures	24.0	(45.0)	3.9	33.6	(50.0)	35.82	3.4
365 - Overhead Conductors & Devices	21.0	(35.0)	3.4	30.0	(35.0)	51.13	2.8
366 - Underground Conduit	50.0	(5.0)	1.8	51.3	(5.0)	19.33	1.7
367 - Underground Conductors & Devices	23.0	(5.0)	3.2	32.6	(5.0)	38.71	2.0
368 - Line Transformers	12.4	(20.0)	4.0	19.7	(20.0)	67.21	2.7
369 - Services	19.9	(35.0)	3.6	32.4	(40.0)	57.16	2.6
370 - Meters	11.9	(10.0)	3.7	13.0	(10.0)	60.68	3.8
371 - Installation on Customers' Premises	9.6	10.0	4.5	13.6	5.0	54.67	3.0
373 - Street Lighting & Signal Systems	7.6	(10.0)	4.9	11.4	(10.0)	52.91	5.0
GENERAL PLANT							
390 - Structures & Improvements	41.0	0.0	2.0	38.0	0.0	24.89	2.0
392.1 - Transportation-Cars	6.0	15.0	11.9	5.2	15.0	44.96	7.7
392.2 - Transportation-Light Trucks & Vans	4.9	12.0	7.8	4.1	12.0	55.20	8.0
392.3 - Transportation - Heavy Trucks	6.4	10.0	7.0	6.1	10.0	53.40	6.0
392.4 - Transportation - Trailers	13.8	5.0	3.7	9.4	5.0	65.28	3.2
396 - Power Operated Equipment	8.4	0.0	4.4	15.4	0.0	37.37	4.1

**FLORIDA PUBLIC UTILITIES
2019 CONSOLIDATED ELECTRIC DIVISIONS
COMPARISON OF ANNUAL DEPRECIATION EXPENSES**

ACCOUNT	1/1/2020 INVESTMENT	1/1/2020 RESERVE	CURRENT		SETTLEMENT PROPOSED - EFFECTIVE DATE 1/1/2020		
			RATE	EXPENSES	RATE	EXPENSES	CHANGE EXPENSES
TRANSMISSION PLANT							
350.1 - Land Rights	\$0	\$0	1.4	\$0	1.3	\$0	\$0
352 - Structures and Improvements	\$1,919,496	\$59,504	1.8	\$34,551	1.7	\$32,631	(\$1,920)
353 - Station Equipment	\$7,581,692	\$1,623,570	2.6	\$197,124	1.8	\$138,745	(\$58,379) *
354 - Towers and Fixtures	\$249,798	\$197,091	2.1	\$5,246	1.9	\$4,746	(\$500)
355 - Poles and Fixtures	\$1,659,809	\$487,283	4.1	\$68,052	4.5	\$75,023	\$6,971 *
355.1 - Poles and Fixtures - Concrete	\$4,014,730	\$678,489	2.9	\$116,427	2.3	\$90,331	(\$26,096) *
356 - Overhead Conductors and Devices	\$3,674,653	\$563,667	2.5	\$91,866	2.3	\$84,517	(\$7,349)
359 - Roads and Trails	\$6,788	\$6,009	1.5	\$102	0.9	\$61	(\$41)
TOTAL TRANSMISSION PLANT	\$19,106,966	\$3,615,614		\$513,368		\$426,054	(\$87,314)
DISTRIBUTION PLANT							
360.1 - Land Rights	\$56,995	\$34,100	1.6	\$912	1.5	\$855	(\$57)
361 - Structures and Improvements	\$1,198,983	\$108,223	1.7	\$20,383	1.8	\$21,582	\$1,199
362 - Station Equipment	\$13,235,887	\$3,869,925	2.4	\$317,661	1.9	\$251,482	(\$66,179) *
364 - Poles, Towers, and Fixtures	\$25,869,789	\$9,265,961	3.9	\$1,008,922	3.4	\$879,573	(\$129,349) *
365 - Overhead Conductors & Devices	\$20,427,593	\$10,443,893	3.4	\$694,538	2.8	\$571,973	(\$122,565)
366 - Underground Conduit	\$7,034,164	\$1,359,793	1.8	\$126,615	1.7	\$117,471	(\$9,144) *
367 - Underground Conductors & Devices	\$10,218,344	\$3,955,509	3.2	\$326,987	2.0	\$207,432	(\$119,555) *
368 - Line Transformers	\$22,458,863	\$15,095,313	4.0	\$898,355	2.7	\$601,898	(\$296,457) *
369 - Services	\$14,341,344	\$8,198,131	3.6	\$516,288	2.6	\$367,138	(\$149,150) *
370 - Meters	\$5,085,099	\$3,085,554	3.7	\$188,149	3.8	\$193,234	\$5,085
371 - Installation on Customers' Premises	\$3,263,292	\$1,784,044	4.5	\$146,848	3.0	\$97,899	(\$48,949)
373 - Street Lighting & Signal Systems	\$2,725,584	\$1,441,996	4.9	\$133,554	5.0	\$136,279	\$2,725
TOTAL DISTRIBUTION PLANT	\$125,915,937	\$58,642,442		\$4,379,212		\$3,446,816	(\$932,396)
GENERAL PLANT							
390 - Structures & Improvements	\$4,044,796	\$1,006,938	2.0	\$80,896	2.0	\$80,896	\$0
392.1 - Transportation-Cars	\$23,951	\$10,768	11.9	\$2,850	7.7	\$1,844	(\$1,006)
392.2 - Transportation-Light Trucks & Vans	\$1,041,834	\$575,092	7.8	\$81,263	8.0	\$83,347	\$2,084
392.3 - Transportation - Heavy Trucks	\$3,755,922	\$2,005,662	7.0	\$262,915	6.0	\$225,355	(\$37,560)
392.4 - Transpiration - Vans	\$144,084	\$94,053	3.7	\$5,331	3.2	\$4,611	(\$720)
396 - Power Operated Equipment	\$898,523	\$335,752	4.4	\$39,535	4.1	\$36,839	(\$2,696)
TOTAL GENERAL PROPERTY	\$9,909,111	\$4,028,265		\$472,790		\$432,892	(\$39,898)
TOTAL RATES	\$154,932,014	\$66,286,321		\$5,365,370		\$4,177,288	(\$1,188,082)
					4-Yr Amort	(\$128,474)	(\$128,474)

* Reflects Settlement Terms

FLORIDA PUBLIC UTILITIES
2019 CONSOLIDATED ELECTRIC DIVISIONS
COMPARISON OF ACCUMULATED BOOK RESERVE AND THEORETICAL RESERVE - PROPOSED RATES

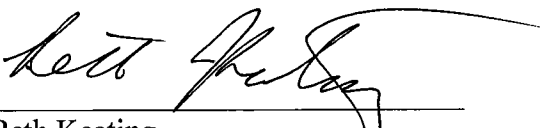
ACCOUNT	1/1/2020 INVESTMENT	1/1/2020 RESERVE	THEORETICAL RESERVE (%)	THEORETICAL RESERVE	IMBALANCE	WLR (%)	ARL (YEARS)	NET SALV (%)
TRANSMISSION PLANT								
350.1 - Land Rights	\$0	\$0	2.50	\$0	\$0	1.3	75.0	0.0
352 - Structures and Improvements	\$1,919,496	\$59,504	3.10	\$59,504	\$0	1.7	57.0	0.0
353 - Station Equipment	\$7,581,692	\$1,623,570	18.30	\$1,387,450	\$236,120	1.9	43.0	0.0
354 - Towers and Fixtures	\$249,798	\$197,091	78.90	\$197,091	\$0	1.9	19.0	(15.0)
355 - Poles and Fixtures	\$1,659,809	\$487,283	69.90	\$1,160,206	(\$672,923)	3.0	26.7	(50.0)
355.1 - Poles and Fixtures - Concrete	\$4,014,730	\$678,489	14.54	\$583,742	\$94,747	2.3	50.2	(30.0)
356 - Overhead Conductors and Devices	\$3,674,653	\$563,667	18.80	\$690,835	(\$127,168)	2.2	46.0	(20.0)
359 - Roads and Trails	\$6,788	\$6,009	82.50	\$5,600	\$409	1.4	12.5	0.0
Total Transmission Assets	\$19,106,966	\$3,615,614		\$4,084,428	(\$468,814)			
DISTRIBUTION PLANT								
360.1 - Land Rights	\$56,995	\$34,100	55.80	\$31,803	\$2,297	1.7	26.0	0.0
361 - Structures and Improvements	\$1,198,983	\$108,223	7.80	\$93,521	\$14,702	1.8	54.0	(5.0)
362 - Station Equipment	\$13,235,887	\$3,869,925	24.80	\$3,282,500	\$587,425	2.0	42.6	(10.0)
364 - Poles, Towers, and Fixtures	\$25,869,789	\$9,265,961	35.76	\$9,251,037	\$14,924	3.4	33.6	(50.0)
365 - Overhead Conductors & Devices	\$20,427,593	\$10,443,893	45.00	\$9,192,417	\$1,251,476	3.0	30.0	(35.0)
366 - Underground Conduit	\$7,034,164	\$1,359,793	22.92	\$1,612,230	(\$252,437)	1.6	51.3	(5.0)
367 - Underground Conductors & Devices	\$10,218,344	\$3,955,509	33.28	\$3,400,665	\$554,844	2.2	32.6	(5.0)
368 - Line Transformers	\$22,458,863	\$15,095,313	54.99	\$12,350,129	\$2,745,184	3.3	19.7	(20.0)
369 - Services	\$14,341,344	\$8,198,131	46.04	\$6,602,755	\$1,595,376	2.9	32.4	(40.0)
370 - Meters	\$5,085,099	\$3,085,554	61.90	\$3,147,676	(\$62,122)	3.7	13.0	(10.0)
371 - Installation on Customers' Premises	\$3,263,292	\$1,784,044	43.32	\$1,413,658	\$370,386	3.8	13.6	5.0
373 - Street Lighting & Signal Systems	\$2,725,584	\$1,441,996	53.00	\$1,444,559	(\$2,563)	5.0	11.4	(10.0)
Total Distribution Assets	\$125,915,937	\$58,642,442		\$51,822,950	\$6,819,492			
GENERAL PLANT								
390 - Structures & Improvements	\$4,044,796	\$1,006,938	24.00	\$970,751	\$36,187	2.0	38.0	0.0
392.1 - Transportation-Cars	\$23,951	\$10,768	44.96	\$10,768	\$0	7.7	5.2	15.0
392.2 - Transportation-Light Trucks & Vans	\$1,041,834	\$575,092	55.20	\$575,092	\$0	8.0	4.1	12.0
392.3 - Transportation - Heavy Trucks	\$3,755,922	\$2,005,662	53.40	\$2,005,662	\$0	6.0	6.1	10.0
392.4 - Transpiration - Vans	\$144,084	\$94,053	59.28	\$85,413	\$8,640	3.8	9.4	5.0
396 - Power Operated Equipment	\$898,523	\$335,752	38.40	\$345,033	(\$9,281)	4.0	15.4	0.0
Total General Plant Assets	\$9,909,111	\$4,028,265		\$3,992,719	\$35,546			
GRAND TOTAL	\$154,932,014	\$66,286,321		\$59,900,097	\$6,386,224			

* Reflects Settlement Terms

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 3rd day of September, 2020:

<p>Florida Public Utilities Company Mike Cassel 208 Wildlight Ave. Yulee, FL 32097 mcassel@fpuc.com</p>	<p>Ashley Weisenfeld Rachael Dziechciarz Bianca Lherisson Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399 awaisenf@psc.state.fl.us rdziehc@psc.state.fl.us blheriss@psc.state.fl.us</p>
	<p>Office of Public Counsel J.R. Kelly/Patricia Christensen/Mireille Fall-Fry c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Kelly.jr@leg.state.fl.us christensen.patty@leg.state.fl.us fall-fry.mireille@leg.state.fl.us</p>

By: 
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