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February 5, 2021

BY E-PORTAL

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

Re: Docket No. 20210000-OT - Proposed Revisions to Rule 25-6.0143, Florida Administrative Code (F.A.C.) – Use of Accumulated Provisions Accounts - Statement of Estimated Regulatory Costs Staff Data Request

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Responses to Staff's First Data Request in the above-referenced matter.

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

Sincerely,

s/Beth Keating _____
Beth Keating
Gunster, Yoakley & Stewart, P.A.
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MEK

cc: Adria Harper (Office of General Counsel)
Sevini Guffey (Division of Economics)

SERC Data Request to Electric Investor-Owned Utilities

Rule 25-6.0143 Use of Accumulated Provision Accounts 228.1, 228.2, and 228.4, F.A.C.

- 1) Proposed revision to Section (1)(e)1 states that the utility may adjust historical monthly contract labor costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the types of transactional costs involved and what would be the estimated annual incremental regulatory costs including transactional costs to your utility to prepare the detailed contract labor costs adjustments?

Company Response: At this time, the Company does not foresee having to make any adjustments to historical data. However, adjustments may be identified in the future. We estimate the incremental cost to review and make these adjustments to be approximately \$2,000 annually.

- 2) Proposed revision to Section (1)(e)8 states that the utility may adjust historical monthly payroll and payroll related costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility to prepare the detailed payroll and payroll related cost adjustments?

Company Response: At this time, the Company does not foresee having to make any adjustments to historical data. However, adjustments may be identified in the future. We estimate the incremental cost to review and make these adjustments to be approximately \$10,000 annually.

- 3) Proposed revision to (1)(e)9 states that the utility may adjust historical monthly fuel costs charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional expenses to your utility to prepare the detailed fuel costs adjustments?

Company Response: At this time, the Company does not foresee having to make any adjustments to historical data. However, adjustments may be identified in the future. FPU estimates the incremental cost to review and make these adjustments to be approximately \$2,000 annually.

- 4) Proposed new language in Section (1)(e)11 states that the utility may adjust historical monthly vegetation management costs specifically related to storm restoration activities, charged to operation and maintenance expenses and that each adjustment shall be accompanied by a detailed explanation of the nature and derivation of the adjustment. What are the annual incremental regulatory, including transactional costs to your utility

to prepare the detailed vegetation management cost adjustments?

Company Response: At this time, the Company does not foresee having to make any adjustments to historical data. However, adjustments may be identified in the future. FPU estimates the incremental cost to review and make these adjustments to be approximately \$5,000 annually.

- 5) Proposed new language in Section (1)(e)12 requires the utility to report other costs and expenses not specifically identified in 1 through 11, that are directly and solely attributable to a storm restoration event. What are the estimated annual regulatory, including transactional costs and expenses to your utility to collect and report this information to the Commission?

Company Response: At this time FPU believes all costs and expenses would have been identified in Sections 1 through 11. However, FPU believes any other incremental costs will be identified during the transaction analysis process and should not generate additional costs.

- 6) Please discuss any potential benefits to your utility from the proposed rule revisions for the accounting of electric utilities' costs that result from storm-related damage.

Company Response: The potential benefit is clarity of the types and costs charged which should limit costs being disputed causing a full hearing.