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October 11, 2021

**BY E-PORTAL**

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

**Re: Docket No. 20210147-GU: Joint petition for approval of swing service rider rates for January through December 2022, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.**

Dear Mr. Teitzman:

Attached for electronic filing, please find the Joint Responses of Florida Public Utilities Company (All Gas Divisions) and the Florida Division of Chesapeake Utilities Corporation to Staff's Second Data Requests in the referenced docket.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

s/Beth Keating  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
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Cc:// Office of Public Counsel (Gentry)

**Docket No. 20210147-GU: Joint petition for approval of swing service rider rates for January through December 2022, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.**

Florida Public Utilities Companies' and Florida Division of Chesapeake Utilities Corporation's Joint Responses to Staff's Second Data Requests

1. Referring to response No. 2 in staff's first data request, the joint petitioners stated that Atrium Economics provided consulting services related to the swing service cost allocation at a cost of \$13,820. Please elaborate on the types of consulting service activities provided and how these services relate to the swing service process.

**Company Response:**

**Florida Division of Chesapeake Utilities Corporation and Florida Public Utilities engaged Atrium Economics, LLC, to review and evaluate its swing service and the application of the current cost allocation method. Atrium provided an assessment of the factors influencing the current cost allocation method and considered the effectiveness of any alternative cost allocation methods.**

2. Referring to response No. 4 in staff's first data request, the increased cost for Gunster, Yoakley, & Stewart is due to the additional assistance provided to FPUC related to the consolidation of tariffs in Docket No. 20200046-GU. Referring to Schedule D in the pending docket, of the \$17,054 Gunster, Yoakley & Stewart cost, please provide the breakdown of the cost allocation related to the swing service rider and the consolidation of tariffs in the 20200046-GU docket. Additionally, please discuss why it is appropriate to include the recovery of costs related to the consolidation of tariffs docket through the swing service rider.

**Company Response:**

**The table below details the costs related to legal incorporated in this filing for Gunster & Yoakley.**

<b>Description of G&amp;Y Costs</b>	<b>Total Costs Between July 2020 and June 2021</b>
Consolidation of Tariffs	\$16,187
Other Swing Service Costs	\$867
<b>Total Gunster &amp; Yoakley Charges</b>	<b>\$17,054</b>

*2 Cont.*

**As part of the Companies' consolidation efforts, the Companies sought to consolidate each entity's tariffs, which included the transportation service programs. There were distinct differences among the Companies' various transportation service processes, which resulted in the management of the four different transportation programs, which were very cumbersome and administratively inefficient. By making the transportation service rules and processes for each of the Company's four service areas consistent within the tariff, the Company is able to provide a uniform level of service to its customers and the pool managers in a more efficient manner. As swing service is directly related to these transportation services, the Companies believe that these costs for consolidation are inextricably linked to the swing service rider. To clarify, these costs are not related to the Companies normal recurring legal expenses, not included in our base rates and therefore, should be included for recovery in this docket.**

3. Prior to the inclusion of the costs for S&P Global Platts as referenced in response No. 2, please explain how FPUC retrieved market data and gas daily pricing.

**Company Response:**

**To calculate sales service and transportation costs, Florida Public Utilities' Energy Logistics department has always obtained the market data and gas daily pricing from S&P Global Platts through the license of another department within the Company. The cost of that license was never allocated to FPUC's PGA or swing. Energy Logistics has since purchased their own license; therefore, these costs are now being appropriately allocated between PGA and swing.**