

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

December 14, 2021

BY E-PORTAL

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

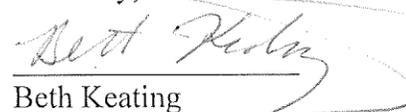
Re: Docket 20210180-EI -- Petition for authority to reinstate the non-firm energy program and tariff, Florida Public Utilities Company

Dear Mr. Teitzman:

Attached for electronic filing, please find Florida Public Utilities Company's responses to Staff's First 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,



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

Cc:// (PSC Staff – Hampson)

Re: Docket No. 20210180-EI - Petition by Florida Public Utilities Company to Reinstate the Non-Firm Energy Program and Tariff.

Responses of FPUC to Staff's First Data Request

1. Please refer to FPUC's responses to staff's first data request in Docket No. 20190132-EI, data response No. 12. In its response, FPUC stated that it would petition the Commission to continue, modify, or discontinue the tariff just prior to the December 31, 2020 expiration date.

a. Please explain why FPUC opted to allow the Non-Firm Energy program tariff to expire, as opposed to petitioning the Commission prior to the program's expiration date.

Response – FPUC opted to allow the Non-Firm Energy program tariff to expire in order to allow the Company time to review the overall effectiveness of the program, with information from the full pilot period, using the data at the end of the expiration date. After reviewing the effectiveness of the pilot program, the Company then wanted time to see if there was customer support to continue the program.

b. Are any customers currently receiving service under the expired Non-Firm Energy program tariff? If so, please explain.

Response – There are currently no customers receiving service under the expired Non-Firm Energy program tariff.

2. For the following questions, please refer to FPUC's responses to staff's first data request in Docket No. 20190132-EI, data response No. 11.

a. In its response, FPUC explained that the success or failure of the pilot program would be based upon the total utilization of non-firm energy by customers involved in the pilot program. Please discuss the total utilization of non-firm energy by customers during the pilot program.

Response – Electric utilization increased for the non-firm energy customers during the pilot program. The total energy and demand purchased by customers in the program increased in 2020 when the program was effective compared to 2018 as shown in the following table below:

	<u>2020</u>	<u>2018</u> ⁽¹⁾	<u>Difference</u>	<u>% Increased</u>
Energy Purchases	51,679,725	20,213,596	31,466,129	156%
Demand Purchases	67,308	1,673	65,635	3923%

⁽¹⁾ 2018 was used as the base year as it provides the full year of data without the Non-Firm Energy program wherein

2019 included data from the program as it became effective in October 3, 2019.

- b. FPUC further states in its response that the goal is to provide a benefit to all customers while improving the overall load factor for the electrical usage on Amelia Island. Did the overall load factor for electrical usage on Amelia Island improve during the life of the Non-Firm Energy pilot program? If so, please provide supporting documentation to demonstrate.

Response – See attached exhibit A. Using the data from the 12-month period ended December 31, 2020, the overall load factor for electrical usage improved. The load factor without the non-firm energy program is at 46% while the load factor with the non-firm program is at 52%.

3. In Paragraph 7 of the Petition FPUC stated that it reviewed the effectiveness of the Non-Firm Energy program and customer needs. How did FPUC's review identify that there is customer demand to continue the program on a permanent basis? Please explain.

Response – As mention in 2b above, the overall factor for electrical usage improved. In addition, the two customers that were in the program requested to continue the program as this energy supply option is beneficial to them.

4. In Paragraph 7 of the Petition FPUC noted that it is seeking approval to open the Non-Firm Energy program to all eligible customers, as opposed to a maximum of three customers. Please explain if FPUC anticipates additional eligible customers and if additional eligible customers have expressed interest in the Non-Firm Energy program.

Response – FPUC currently has one GSLD1 customer and one Standby customer that are eligible on this program. If additional customers become eligible per the terms of the proposed tariff, the Company seeks the ability to offer the program to those customers, should it fit their needs. There are several potential customers looking to move to the Amelia Island area and the Non-Firm Energy program will allow the Company to provide this option to help attract businesses in the area.

5. Please confirm that the costs to purchase and any revenue received for non-firm energy for all eligible customers will not be included in FPUC's annual Purchased Power Cost Recovery filings.

Response – Cost to purchase and revenues received for Non-Firm Energy for all eligible customers will not be included in FPUC's annual Purchased Power Cost Recovery filings.

Exhibit A

2020 Load Factor without Non-Firm													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
FPL Block	67.9%	64.1%	66.4%	62.7%	81.7%	93.7%	99.4%	96.3%	91.0%	83.0%	64.6%	89.4%	
FPL Load Following	8.7%	8.6%	5.6%	5.3%	18.1%	20.3%	37.8%	19.6%	21.7%	17.7%	11.5%	15.3%	
Eight Flags	88.5%	87.6%	89.4%	92.4%	90.5%	83.1%	91.2%	79.2%	91.3%	88.0%	88.8%	92.1%	
Non-Firm West Rock													
West Rock	52.0%	0.0%	0.0%	110.0%	16.4%	3.7%	2.9%	8.5%	14.6%	3.0%	8.3%	11424.7%	
Non-Firm Rayonier													
Rayonier	4.6%	0.0%	89.2%	109.4%	9.8%	11.5%	18.0%	25.4%	1387.2%	6.8%	0.0%	0.0%	
Total	38.1%	51.2%	41.3%	48.3%	48.6%	37.1%	55.5%	37.5%	48.0%	45.4%	50.1%	51.2%	46.0%

2020 Load Factor with Non-Firm													
	January	February	March	April	May	June	July	August	September	October	November	December	Total
FPL Block	67.9%	64.1%	66.4%	62.7%	81.7%	93.7%	99.4%	96.3%	91.0%	83.0%	64.6%	89.4%	
FPL Load Following	8.7%	8.6%	5.6%	5.3%	18.1%	20.3%	37.8%	19.6%	21.7%	17.7%	11.5%	15.3%	
Eight Flags	88.5%	87.6%	89.4%	92.4%	90.5%	83.1%	91.2%	79.2%	91.3%	88.0%	88.8%	92.1%	
Non-Firm West Rock	KWH Added to WestRock												
West Rock	146.1%	0.0%	0.0%	253.0%	77.4%	14.3%	10.7%	45.5%	22.9%	5.0%	4408.3%	51747.3%	
Non-Firm Rayonier	KWH Added to Rayonier												
Rayonier	34.4%	0.0%	152.5%	284.2%	99.2%	102.7%	107.1%	322.5%	3182.1%	101.7%	0.0%	0.0%	
Total	45.5%	65.4%	46.3%	53.1%	54.6%	41.6%	60.2%	42.3%	53.1%	48.8%	57.6%	56.5%	52.1%