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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

September 11, 2023

Beth Keating, Esquire  
Gunster, Yoakley & Stewart, P.A.  
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Tallahassee, FL 32301  
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## STAFF'S FIRST DATA REQUEST VIA-EMAIL

Michelle Napier  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, FL 33411  
mnapier@fpuc.com

**Re: Docket No: 20230101-GU: Petition for approval of gas utility access and replacement directive cost recovery factors for January 2024 through December 2024, by Florida Public Utilities Company.**

Dear Ms. Keating and Ms. Napier:

By this letter, Commission staff respectfully requests that FPUC provide responses to the following data requests.

1. Please provide all the schedules (A, B, C, D, and E) of Exhibit RCW-1 filed in witness Waruszewski's direct testimony in Excel format with formulas unlocked.
2. With reference to Schedule A-1, page 1 of 9, attached to the direct testimony of witness Waruszewski, please provide the calculations used to determine the Revenue Expansion Factor of 1.3529.
3. According to witness Waruszewski's direct testimony on page 4 of 6, lines 6 through 8, and as shown on Schedule C-1, page 6 of 9, the company began incurring costs for GUARD in April 2023. However, Exhibit RCW-2, page 1 of 1 indicates that construction began in June 2023. Please explain the timing discrepancy and the type of costs incurred in April and May 2023.
4. With reference to witness Waruszewski's direct testimony on page 5 of 6, lines 19 through 21 regarding other expenses included in the projection period, please identify: (1) in which

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line of the projection schedule the other expenses are included and (2) identify the estimated cost of extending customer-owned fuel lines to connect to meters.

5. With reference to witness Waruszewski's direct testimony on page 5 of 6, lines 19 through 21, what are the safety concerns that require FPUC to relocate customer-owned fuel lines?
6. Referring to Exhibit RCW-2, which includes the projects and areas to be addressed by the GUARD program in 2023 and 2024, please discuss if the projects were prioritized by using FPUC's Distribution Integrity Management Program.
7. Referring to Exhibit RCW-2, please provide the number of miles, separated by county, for each of the 15 projects categorized as Rear-to-Front, Obsolete/Adyl-A, and Span.
8. Please explain how and when FPUC plans to notify its customers of the new 2024 GUARD surcharge. Please also provide a copy of the customer notice to staff.

Please file all responses electronically no later than September 18, 2023 via the Commission's website at [www.floridapsc.com](http://www.floridapsc.com) by selecting the Clerk's Office tab and Electronic Filing Web form. If you have any questions, please contact me at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) or at 850.413.6204.

Thank you.

/s/Sevini Guffey

Sevini Guffey

Public Utility Analyst IV

cc: Office of the Commission Clerk