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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

September 14, 2023

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301

**STAFF'S FIRST DATA REQUEST**  
**Via E-Mail**

Michelle D. Napier  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, FL 33411

**Re: Docket No. 20230096-GU - Petition for approval of swing service rider rates for January through December 2024, by Florida Public Utilities Company.**

Dear Ms. Keating and Ms. Napier:

By this letter, the Commission staff respectfully requests Florida Public Utilities Company (FPUC) to provide responses to the following questions, regarding the petition for approval of swing service rider rates for January through December 2024.

1. Referring to Schedule D of Exhibit RCW-1 to the petition for the following data requests.
  - a. Please explain the reasons for the Pierpont & McLelland cost change from \$38,514 in 2021/2022 to \$90,142 in 2022/2023 and provide a description of the services Pierpont & McLelland provides to FPUC.
  - b. Please explain the reasons for the Snell & Wilmer LLP cost change from \$87,604 in 2021/2022 to \$8,789 in 2022/2023 and provide a description of the services Snell & Wilmer LLP provides to FPUC.
  - c. Please explain the reasons for the Cardinal Technology LLC cost change from \$60,000 in 2021/2022 to \$10,000 in 2022/2023 and provide a description of the services Cardinal Technology LLC provides to FPUC.
  - d. Please explain the reasons for the Emera Energy Services Inc. cost change from \$1,176,258 in 2021/2022 to \$608,898 in 2022/2023 and provide a description of the services Emera Energy Services Inc. provides to FPUC.

- e. Please explain the reasons for the Marlin Gas Services LLC cost change from \$975,320 in 2021/2022 to \$3,726,982 in 2022/2023 and provide a description of the services Marlin Gas Services LLC provides to FPUC.
  - f. Please explain the reasons for the Cavanaugh and Associates cost change from \$900 in 2021/2022 to \$3,250 in 2022/2023 and provide a description of the services Cavanaugh and Associates provides to FPUC.
  - g. Please explain the reasons for the Baker & Hostetler cost change from \$1,809 in 2021/2022 to \$8,146 in 2022/2023 and provide a description of the services Baker & Hostetler provides to FPUC.
2. Please refer to Schedule D of Exhibit RCW-1 of the petition and provide a detailed description and cost justification for the following costs proposed to be included in the swing service rider rates:
    - a. Wildlight 1C
    - b. Wildlight 1B
    - c. Winter Haven
    - d. New River RNG LLC
    - e. Convergence Solutions LLC
    - f. Enverus Inc.
  3. Please provide schedules A through D of Exhibit RCW-1 of the petition, in Excel format with formulas intact.

Please file all responses electronically no later than September 21, 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. Please contact me at [kmcclell@psc.state.fl.us](mailto:kmcclell@psc.state.fl.us) or at 850.413.6814 if you have any questions.

Thank you,

/s/Kate McClelland

Kate McClelland  
Public Utility Analyst

cc: Office of the Commission Clerk (Docket No. 20230096-GU)