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October 25, 2023

BY E-PORTAL

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

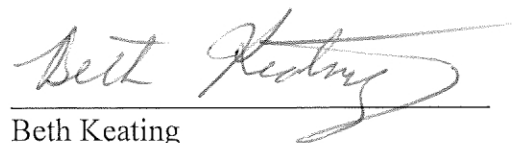
**Re: Docket No. 20230096-GU: Petition for approval of swing service rider rates for
January through December 2024, by Florida Public Utilities Company.**

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Revised Responses to Staff's First Data Requests, Nos. 1 (e-g) and 2(d).

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,



Beth Keating
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MEK

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

Florida Public Utilities Company's Revised Response to Staff's
First Data Requests, Nos. 1(e)-(g) and 2(d)

1. Referring to Schedule D of Exhibit RCW-1 to the petition for the following data requests.
 - 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.

Company Revised Response:

e. Marlin Gas Services provides temporary gas supply to feed customers while new pipeline projects are under construction, support and maintain system pressure requirements in locations of high demand and maintain system integrity in the event of emergencies where gas supply is interrupted. The increase in costs over the previous year are mainly due to ongoing new construction projects that require gas supply until the pipeline construction is completed.

f. Cavanaugh & Associates provided consulting services on various matters related to FGT Tariff, RNG documents, and FERC technical conferences.

g. Baker & Hostetler provided legal and professional services on general contract matters and technical research regarding gas prepayment opportunities.

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:

d. New River RNG LLC

Company Revised Response:

d: The New River RNG costs of \$3,030,023 were for the purchase of gas from a renewable landfill gas producer for a limited amount of time while the producer awaited completion of its direct connection pipeline with Florida Gas Transmission's ("FGT") facilities.

Specifically, the New River Solid Waste Association (“New River”) is a waste management company serving Lake Butler, Macclenny, Starke, Union County, Baker County, Bradford County and elsewhere. It owns a landfill that produces methane near Starke. In partnership with Opal Fuels, New River has developed an RNG production facility at the landfill. New River contracted with another entity to build a pipeline segment to connect its production facilities directly with FGT. The RNG production facilities were completed before the pipeline that could deliver the RNG to FGT. As such, New River had no way to deliver the RNG to market. Its only alternative was to flare (burn off) the excess gas, which would have resulted in losses associated not just with the unsold commodity, but also the valuable Renewable Energy Credits (“RENs”). FPUC offered to buy the gas, without the RENs, until New River’s pipeline connection to FGT was completed. New River/Opal agreed to cover the cost of delivery of the gas to FPUC, because having FPUC buy the gas allowed New River/Opal to mitigate their losses. Thus, FPUC was able to buy the gas from the New River facility at the Platts IFERC Florida Zone 3 monthly index pricing, and New River was able to mitigate its losses by potentially reselling the RENs associated with the gas sold to FPUC. In purchasing the gas from New River, FPUC was able to obtain commodity at market price, minus variable transportation and capacity charges, given that New River/Opal agreed to pay for the gas to be delivered, via truck, to FPUC’s injection point.

In total, FPUC was able to acquire 365,159 dekatherms of gas for \$3,030,023, which was a savings of \$149,538 compared to gas traditionally acquired at market and delivered via pipeline. This was a savings of approximately \$0.05 per dekatherm.