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December 12, 2023

BY E-PORTAL

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

Re: Joint Responses of Florida Public Utilities Company (Electric and Gas Divisions) and Florida City Gas to Staff's Statement of Estimated Regulatory Costs (SERC) Data Request for the Proposed Amendments to Rule 25-14.004, Florida Administrative Code (F.A.C.)

Dear Mr. Teitzman:

Attached, please find the Joint Responses of Florida Public Utilities Company (Electric and Gas Divisions) and Florida City Gas to Staff's Data Requests for the Statement of Estimated Regulatory Costs associated with the Proposed Amendments to Rule 25-14.004, F.A.C.

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,



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MEK

Cc: Sevini Guffey

Joint Responses of Florida Public Utilities Company (Electric and Gas Divisions) and Florida City Gas to Staff's SERC Data Request Regarding Changes to Rule 25-14.004, F.A.C.

Below, please find the responses of Florida Public Utilities Company ("FPUC")(Electric and Gas Divisions, as well as Florida City Gas ("Companies")(jointly herein, "Companies") to Staff's Statement of Estimated Regulatory Costs (SERC) Data Request regarding the proposed Amendment of Rule 25-14.004, Florida Administrative Code, Determination of Total Corporate Income Tax.

1. Proposed revisions to Rule 25-14.004, F.A.C., describes the methodology how a regulated utility's stand-alone income tax expense will be calculated. Would calculating your utility's stand-alone income tax expense using the proposed methodology result in incremental costs to your utility? If yes, please state the incremental annual cost.

Company Response: The Companies do not anticipate any incremental costs associated with either Staff's proposed amendments or the changes proposed in the Joint Comments submitted on September 26, 2023.

2. Would the proposed revisions to Rule 25-14.004, F.A.C., directly or indirectly result in incremental regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

Company Response: The Companies do not anticipate any incremental costs in excess of \$200,000 associated with either Staff's proposed amendments or the changes proposed in the Joint Comments submitted on September 26, 2023.

3. Please state if the proposed rule revisions would result in any cost savings to your utility and if so, state the categories and estimated amounts of cost savings.

Company Response: The Companies do not anticipate any cost savings associated with either Staff's proposed amendments or the changes proposed in the Joint Comments submitted on September 26, 2023.

A “Small Business” is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

4. Considering the above stated definition, please state if your water and/or water and wastewater utility is a small business.

Company Response:

N/A

5. If yes, please state if the proposed rule would have an adverse, minimal, or no financial impact on your utility.

Company Response:

N/A

6. Would the proposed rule directly or indirectly result in incremental regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

Company Response: The Companies do not anticipate any incremental costs in excess of \$200,000 associated with either Staff’s proposed amendments or the changes proposed in the Joint Comments submitted on September 26, 2023.

7. Would the proposed rule revisions have an adverse incremental impact on economic growth, private-sector job creation or employment, and private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Company Response: They would not to the Companies’ knowledge and belief.

8. Would the proposed rule revisions have an adverse incremental impact on business competitiveness, productivity, and innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Company Response: They would not to the Companies' knowledge and belief.

9. Would the proposed rule revisions result in incremental regulatory costs, including any transactional costs (Transactional costs" include filing fees, the cost of obtaining a license, the cost of equipment required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule) to your utility, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? If yes, please explain.

Company Response: They would not to the Companies' knowledge and belief.

A "Small City" is defined by Section 120.52, F.S., as any municipality that has an unincarcerated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section 120.52, F.S., as any county that has an unincarcerated population of 75,000 or less according to the most recent decennial census.

10. Considering the above definition, please state if your utility serves a small city or several small cities, or a small county/counties? Would the small city/cities/county/counties served by your utility have financial impacts or no impacts due to the proposed rule revisions?

Company Response: Yes, the Companies serve small city/cities/county/counties, but the changes would not have any financial impacts or otherwise due to the proposed rule revisions to the best of the Companies' knowledge and belief.

11. Please provide any additional information, including any tasks not identified above, which would result in incremental costs to you utility, due to the proposed revisions to the rule, which the Commission may determine useful. [120.541(2)(f), F.S.]

Company Response: The Companies do not anticipate any incremental costs associated with either Staff's proposed amendments or the changes proposed in the Joint Comments submitted on September 26, 2023.