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September 5, 2024

**BY E-PORTAL**

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


**Re: Docket No. 20240001-EI: Fuel and Purchased Power Cost Recovery Clause with  
Generating Performance Incentive Factor**

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Petition for Approval of Fuel Adjustment and Purchased Power Cost Recovery Factors. Supporting Testimony and Exhibits follow under separate cover.

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

MEK  
cc://(Certificate of Service)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery clause with generating performance incentive factor. | DOCKET NO. 20240001-EI  
| DATED: September 5, 2024

**FLORIDA PUBLIC UTILITIES COMPANY'S PETITION FOR APPROVAL OF FUEL  
ADJUSTMENT AND PURCHASED POWER  
COST RECOVERY FACTORS**

Florida Public Utilities Company (FPUC or Company), by and through its undersigned counsel, hereby files this Petition asking the Florida Public Service Commission (FPSC or Commission) for approval of FPUC's fuel adjustment and purchased power cost recovery factors for the period January 2025 through December 2025. In support of this request, the Company hereby states:

- 1) FPUC is an electric utility subject to the Commission's jurisdiction. Its principal business address is:

Florida Public Utilities Company  
208 Wildlight Ave.  
Yulee, FL 32097

- 2) The name and mailing address of the persons authorized to receive notices are:

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

Michelle D. Napier  
Director, Regulatory Affairs Distribution  
Florida Public Utilities Company  
1635 Meathe Drive  
West Palm Beach, Florida 33411  
W: (561) 838-1712  
mnapier@fpuc.com

- 3) Consistent with the requirements for this proceeding, the Company has pre-filed the fuel adjustment and purchased power cost recovery schedules supplied by the Commission

consistent with the requirements for such filings and have reflected therein the Company's calculated fuel adjustment factors.

4) In accordance with Order PSC-2024-0027-PCO-EI, issued February 6, 2024, as revised by Order No. PSC-2024-0211-PCO-EI, issued June 20, 2024, in this Docket, the Company is also submitting, contemporaneously with this Petition, the Direct Testimony of Ms. Brittnee Baker, along with Exhibit BB-2, as well as the Direct Testimony of Mr. Mark Cutshaw, in support of the Company's request for approval of the requested factors.

5) The testimonies of the Company's witnesses also address the status of the Company's ongoing initiatives to mitigate fuel costs through arrangements with alternative energy providers, as well as possible new projects. Notably, the Company continues to pursue CHP and solar projects that demonstrate the greatest potential for success and to produce savings for FPUC's customers, as well as hydrogen and RNG technologies.

6) In addition, consistent with past requests of the Company, the Company seeks to recover certain legal and consulting costs associated with fuel and purchased power projects designed to reduce fuel and purchased costs for FPUC's customers, which have not otherwise been included for recovery in base rates. These costs are consistent with Commission policy set forth in Order No. 14546, as well as Commission decisions allowing the Company to recover such costs in Order No. PSC-2005-1252-FOF-EI, issued in Docket No. 20050001-EI, as well as similar such decisions by the Commission to allow similar costs to be recovered by the Company through the Fuel and Purchased Power Cost Recovery Clause, including, most recently, in Docket No. 20220001-EI and 20230001-EI. Again, the subject legal and consulting costs are not being recovered through the Company's base rates. Moreover, without the legal and consulting assistance associated with these costs, the Company would be unable to identify, analyze, and

implement the cost-saving projects that it has implemented thus far, nor similar such projects that it continues to pursue with the objective of obtaining reduced fuel and purchased power costs for the benefit of its customers.

7) The Company is also seeking approval to change how it bills and allocates purchase power costs to its two industrial customers. As explained by Witness Cutshaw, the Company currently sends an estimated bill based on estimated KW demand for the prior month, followed by a final bill once the actual KW demand charges coincident with the FPUC peak and FPL peak are determined, which can only occur once additional data is obtained. Witness Cutshaw explains that the Company would like to change this process, which simplifies the monthly accounting process, and instead issue only a final bill based upon the industrial customers' KW maximum demand for the preceding month, with additional costs associated with peak demand allocated and true-up in the calculation of the charges annually. In addition, the Company is proposing to eliminate the Time of Use cost recovery factors. No customers are served under the Time of Use rate schedule, and the GSLDT expired in February 2015.

8) As set forth in the Testimony and Exhibit BB-2 of Witness Baker, the Company's total true-up amount that would be refunded during the period January 2025 through December 2025 is an over-recovery of \$4,694,677 for the Consolidated Electric Division. In addition, with this filing, the Company is including the revised Actual/Estimated Testimony of Witness Baker and Revised Exhibit BB-1, which have been adjusted to reflect the changes to the Company's forecasted billing determinants, as discussed by Witness Baker.

9) Based upon the Company's projections and the total true-up amounts to be collected for both Divisions, including the adjustments noted above, the appropriate levelized fuel adjustment and purchased power cost recovery factors for the period January 2025 through

December 2025, excluding demand cost recovery and adjusted for line loss multipliers and including taxes, are as follows:

<i>Rate Schedule</i>	<i>Adjustment</i>
RS	\$0.07849
GS	\$0.07890
GSD	\$0.07392
GSLD	\$0.07176
LS	\$0.05872
<u>Step rate for RS</u>	
RS Sales	\$0.07849
RS with less than 1,000 kWh/month	\$0.07505
RS with more than 1,000 kWh/month	\$0.08755

10) For the Consolidated Electric Division, the total fuel adjustment factor is 5.550¢ per kWh for "other classes." Thus, a customer in either Division using 1,000 kWh will pay \$163.80, a decrease of \$2.18 from the prior period.

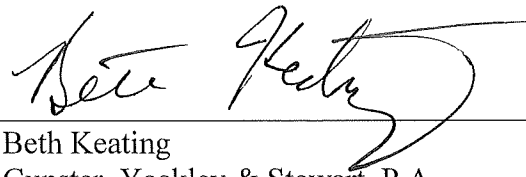
11) The Company attests that these factors have been calculated correctly and consistent with Commission requirements. Thus, the Company asks that the Commission approve the proposed factors as set forth herein.

WHEREFORE, FPUC respectfully requests that the Commission approve the Company's proposed fuel adjustment and purchased power cost recovery factors for January 2025 through

Docket No. 20240001-EI

December 2025.

RESPECTFULLY SUBMITTED this 5<sup>th</sup> day of September, 2024.

A handwritten signature in black ink, appearing to read "Beth Keating", written over a horizontal line.

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

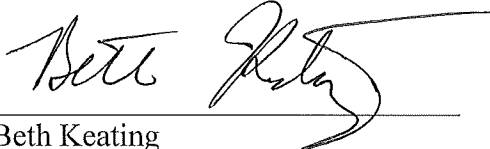
*Attorneys for Florida Public Utilities Company*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing Petition for Approval of Fuel Adjustment and Purchased Power Cost Recovery Factors has been furnished by Electronic Mail to the following parties of record this 5<sup>th</sup> day of September, 2024:

<p>Suzanne Brownless                  Ryan Sandy                  Florida Public Service Commission                  2540 Shumard Oak Boulevard                  Tallahassee, FL 32399-0850  <a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a>  <a href="mailto:rsandy@psc.state.fl.us">rsandy@psc.state.fl.us</a></p>	<p>J. Jeffrey Wahlen/Malcolm Means/Virginia Ponder                  Ausley Law Firm                  Post Office Box 391                  Tallahassee, FL 32302  <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a>  <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a>  <a href="mailto:vponder@ausley.com">vponder@ausley.com</a></p>
<p>P. Christensen / Charles Rehwinkel/Mary Wessling                  Office of Public Counsel                  c/o The Florida Legislature                  111 W. Madison Street, Room 812                  Tallahassee, FL 32399-1400  <a href="mailto:Wessling.Mary@leg.state.fl.us">Wessling.Mary@leg.state.fl.us</a>  <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a>  <a href="mailto:Christensen.patty@leg.state.fl.us">Christensen.patty@leg.state.fl.us</a></p>	<p>James W. Brew/Laura Baker                  Stone Matheis Xenopoulos &amp; Brew, PC                  Eighth Floor, West Tower                  1025 Thomas Jefferson Street, NW                  Washington, DC 20007  <a href="mailto:jbrew@smxblaw.com">jbrew@smxblaw.com</a>  <a href="mailto:lwb@smxblaw.com">lwb@smxblaw.com</a></p>
<p>Maria Moncada                  David Lee                  Florida Power &amp; Light Company                  700 Universe Boulevard                  Juno Beach, FL 33408-0420  <a href="mailto:Maria.Moncada@fpl.com">Maria.Moncada@fpl.com</a>  <a href="mailto:David.Lee@fpl.com">David.Lee@fpl.com</a></p>	<p>Kenneth Hoffman                  Florida Power &amp; Light Company                  215 South Monroe Street, Suite 810                  Tallahassee, FL 32301  <a href="mailto:Ken.Hoffman@fpl.com">Ken.Hoffman@fpl.com</a></p>
<p>Ms. Paula K. Brown                  Tampa Electric Company                  Regulatory Affairs                  P.O. Box 111                  Tampa, FL 33601-0111  <a href="mailto:Regdept@tecoenergy.com">Regdept@tecoenergy.com</a></p>	<p>Florida Industrial Users Power Group                  Jon C. Moyle, Jr.                  Moyle Law Firm                  118 North Gadsden Street                  Tallahassee, FL 32301  <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a></p>

<p>Mike Cassel Florida Public Utilities Company 208 Wildlight Ave. Yulee, FL 32097 <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p>	<p>Matthew Bernier Robert Pickels Stephanie Cuello Duke Energy 106 East College Avenue, Suite 800 Tallahassee, FL 32301 <a href="mailto:Matthew.Bernier@duke-energy.com">Matthew.Bernier@duke-energy.com</a> <a href="mailto:Robert.Pickels@duke-energy.com">Robert.Pickels@duke-energy.com</a> <a href="mailto:Stephanie.Cuello@duke-energy.com">Stephanie.Cuello@duke-energy.com</a></p>
<p>William C. Garner, Esq. Law Office of William C. Garner, PLLC 3425 Bannerman Road Unit 105, No. 414 Tallahassee, Florida 32312 Telephone: (850)329-5478 Mobile: (850)320-1701 FAX: (850) 792-6011 <a href="mailto:bgarner@wcglawoffice.com">bgarner@wcglawoffice.com</a></p>	<p>Dianne M. Triplett Duke Energy 299 First Avenue North St. Petersburg, FL 33701 <a href="mailto:Dianne.Triplett@duke-energy.com">Dianne.Triplett@duke-energy.com</a></p>

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