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9/10/2024

SJNG's Response to 2nd Data Request

Docket No. 20240046-GU – Petition for rate increase by SJNG

1. On MFR Sch. G1, pg. 1 of 28, the company shows a projected test year amount of \$140,262 in CWIP. Provide a list of projects included in the CWIP amount.
 - A. There is not a list of projects – this running balance is a list of items allocated to CWIP that will be added to Plant Accounts when put into Service. Such as: labor to run new services or material for new service lines or mains.

2. On MFR Sch G-2, pg. 13, the company shows an increase to \$41,000 in the projected test year for pension – utility. Please explain the trend basis for this increase.
 - A. It is stated in the total for 2022, but separated for 2023

3. Please explain the allocation method used for removing non-utility activities from the projected test year plant in service, Accum. Depreciation, and working capital.
 - A. Non-Utility activities % from 2023 Labor Recap of Payroll was used for allocation.

4. Please explain the allocation method used for removing non-utility activities from the projected test year O&M expense, including depreciation and amortization expense.
 - A. O&M Expenses were not adjusted for non-utility for 2024, and depreciation and amortization were the 23.9% - Labor Recap of Payroll.

5. Please refer to the direct testimony of witness Stitt, page 12, lines 5 through 11. Please explain why all sources of capital were used, and not exclusively investor sources.
 - A. All sources of regulated capital have always been used.

6. Please refer to the direct testimony of witness Stitt, Page 12, lines 19 through 22. Please cite where the loan in February 2024 from Centennial Bank for \$248,111 is reflected in the MFR's.
A. It is not reflected in the MFR's because it was a Non-Regulated loan.
7. On MFR Sch. G-3, page 2 of 11, please explain why the cost rate for long-term debt of 8.5% does not reflect the embedded cost of long-term debt on MFR Sch G-3, page 3 of 11?
A. I reported 8.5% on total long-term debt on Sch G-3, pg. 2 when it should have been 7.95%.
8. On MFR Sch G-3, page 3 of 11, line 3, has the loan from Centennial Bank for \$500,000 been executed?
A. No, it has not been executed.
9. On MFR Sch G-3, page 2 of 11, please explain for what purpose is the non-utility debt included on the company's books. What is its purpose?
A. The Non-utility debt is included on G-3, page 2 to tie back to the balance sheet.
10. On MFR Sch G-2, page 31 of 31, why is SJNG using a state tax rate of 4.46%
A. That is what SJNG was advised by their accountant.
11. On MFR Sch. G-3, page 2 of 11, please explain what the "Deferred Credits – FCPC" are and from where did they originate?
A. Please refer to PSC-01-1274-PAA-GU
12. Please provide a copy of the loan agreement with Centennial Bank as reflected on MFR Sch G-3, page 3 of 11, lines 3 and 4.
A. The loans have not been executed, therefore I don't have copies.

Sincerely,

Debbie Stitt
Bookkeeper