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STATE OF FLORIDA



DIVISION OF ECONOMICS
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Public Service Commission

September 24, 2024

Beth Keating, Esquire
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301
bkeating@gunster.com

**STAFF'S FIRST DATA REQUEST
VIA-EMAIL**

Michelle Napier
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, FL 33411
mnapier@fpuc.com

Re: Docket No. 20240137-GU: Petition for approval of GUARD cost recovery factors, by Florida Public Utilities Company.

Dear Ms. Keating & Ms. Napier:

By this letter, Commission staff respectfully requests that FPUC provide responses to the following data requests.

1. Please provide all the schedules (A, B, C, D, and E) of Exhibit SKL-1, exhibit titled Calculation of Equity and Debt Returns, and Exhibit SKL-2 filed in witness Laster's direct testimony in Excel format with formulas unlocked.
2. In paragraph 6 of the petition, please refer to the last segment of the sentence which refers to the "proposed GUARD cost recovery factors for 2024". Please state if this reference is correct or it is a scrivener's error.
3. Please provide Schedules A and B of composite Exhibit SKL-1 of witness Laster's testimony.
4. Paragraph 8 of the petition states that "The total projected GUARD true-up, which includes the final true-up for GRIP, to be refunded to customers in 2025 is a net under-recovery of \$685,595, inclusive of interest." Please explain if this is a correct statement regarding the customer refund.

5. Referring to page 5 of 5 of witness Laster's testimony, please state where the customer-owned fuel line extension expenses are shown in the schedule(s).
6. Page 4 of 5 of witness Laster's testimony states that "FPUC is expecting invest \$16,167,834 in mains and \$8,832,371 for services in 2025". Of these costs, what amount will be expended for customer-owned fuel line extensions in 2025?
7. With reference to the page titled Calculation of Equity and Debt Returns, attached to the direct testimony of witness Laster, please provide the calculations used to determine the Revenue Expansion Factor of 1.349.
8. Referring to Exhibit SKL-2, titled GUARD Projects 2023-2025 Actual/forecast, of the listed projects, please identify the projects that extend the customer-owned fuel lines.
9. Please explain how and when FPUC plans to notify its customers of the new 2025 GUARD surcharge. Please also provide a copy of the customer notice to staff.
10. Order No. PSC-2023-0235-PAA-GU, which established the GUARD program, ordered that FPUC shall be required to file its annual GUARD cost recovery petitions to revise the surcharge on or before September 1 of each year and implement the revised surcharge effective January 1 through December 31 of the following year. Please discuss any potential impacts that would arise if the Commission were to require FPUC to file the GUARD cost recovery petition by August rather than by September.

Please file all responses electronically no later than October 8, 2024 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web form. If you have any questions, please contact me at sguffey@psc.state.fl.us or at 850.413.6204.

Thank you.

/s/Sevini Guffey
Sevini Guffey
Public Utility Analyst IV

cc: Office of the Commission Clerk