



Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

October 3, 2024

BY E-FILING

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

Re: Docket No. 20240099-EI - Petition for rate increase by Florida Public Utilities Company

Dear Mr. Teitzman:

Attached, for electronic filing, on behalf of Florida Public Utilities Company, please find the Company's Responses to Staff's Second Set of Data Requests.

Sincerely,

A handwritten signature in cursive script that reads "Beth Keating".

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

Cc: (Service List)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Public Utilities Company. | DOCKET NO. 20240099-EI

FPUC'S RESPONSES TO STAFF'S SECOND DATA REQUESTS

1. Please refer to MFR Schedule B-6, page 4 of 6; E-3a; E-3b; E-5; and E-13d. Are only LEDs, and no other lamp types, included in FPUC's development of rate base, expense, and revenue for lighting services, as reflected in these MFR schedules? If not, please explain which other lamps are included and how.

Company Response:

No, the Company has included light fixtures that are not LED in MFR Schedule B-6. MFR B-6, line 30 is the 13-month average of Account 371 projected for 2025 and line 31 is the 13-month average of Account 373 projected for 2025.

The year-end balance of these accounts on B-8, page 7, line 32-35 consist of the following:

- a. **The assets include lighting conductors, luminaires, light poles, services, and conduit for the lights that were in service in 2023. Other lights included in the 2023 balance were High Pressure Sodium, Metal Halide, or Mercury Vapor lights. The Continuing Property Records (CPR) do not separate out the luminaires by the light type. However, according to our billing records, 830 are LED lights at 7/31/2024. Separately, the Company intends to pursue approval of a conservation program to convert remaining non-LED lights to LED's. As part of that planned program, the Company will verify all existing lights and determine an appropriate conversion period which will be included as part of the proposed conservation program.**
- b. **The 2024 and 2025 plant additions projected do not include a change out program to replace the High Pressure Sodium, Metal Halide, or Mercury Vapor lights that are in**

the 2023 balances. However, all new customer lights and planned service work on lights as needed during this time period would replace lights with LED lights and a portion of this work is included blanket work orders for revenue producing plant and renewal and replacement work that were included in the 2024 and 2025 plant additions. However, the planned conservation conversion program of the non-LED lights has not been included in the 2024 and 2025 projected additions. As part of the anticipated conservation filing, the normal maintenance projections that have been included in the rate case will be excluded from the conservation filing.

MFR Schedule E-3a agrees to the total projected rate base on B-1 page 3 and has been allocated to lighting based on the current cost of service percentages determined in the cost of service study. The rate base used as a basis for allocation included the net costs of the assets described above for B-8.

MFR Schedule E-3b agrees to the expenses in C-1 page 3 and has been allocated to lighting based on the current cost of service percentages determined in the cost of service study. The total expenses would include costs related to lighting based on the assets described in a and b above.

The revenue reflected in MFR Schedule E-5 assumes that a proposed conservation program would be approved and that all lights would be converted to LED through a conservation program. If the conservation program is approved but ultimately deviates from the test year projections, then a true up may be necessary, which the Company anticipates would take place in the conservation cost recovery clause.

MFR Schedule E-13d is the proposed rate design and likewise assumes that all lights would be converted to LED through a conservation program at the end of 2025. However, the timing of the actual conversion may vary depending on the approval and specifics regarding the anticipated conservation program. If the conversions are not completed by the end of the test year, a true-up may be required in the conservation program for the change in revenue requirement on the new LED lights.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 3rd day of October, 2024:

<p>Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us discovery-gcl@psc.state.fl.us</p>	<p>Walt Trierweiler/P. Christensen / Charles Rehwinkel/Mary Wessling/Octavio Ponce/Austin Watrous Office of Public Counsel c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.Walt@leg.state.fl.us Wessling.Mary@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.patty@leg.state.fl.us Ponce.octavio@leg.state.fl.us Watrous.austin@leg.state.fl.us</p>
<p>Michelle Napier Florida Public Utilities Company 1635 Meathe Drive West Palm Beach FL 33411 mnapier@fpuc.com</p>	

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