

STATE OF FLORIDA

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Public Service Commission

October 31, 2024

STAFF'S TENTH DATA REQUEST *via email*

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

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

Dear Ms. Keating:

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC) provide responses to the following data requests:

- 1.) Please complete the below table, which details the total number of complaints by type and year that were received by FPUC from January 2020 through October of 2024.

	Type of Complaints	
	Quality of Service	Billing Issues
2020		
2021		
2022		
2023		
2024 (January – October)		
Total		

2.) Please refer to the direct testimony of witness Estrada for the following questions:

- a. Please refer to page 6, lines 1 through 4. Please identify and explain the specific improvements in timing and accuracy of billing through the new Customer Information System (NCIS).
- b. Please refer to page 6, lines 4 through 7. Witness Estrada identifies potential future enhancements such as a customer portal and preference management. What are the anticipated in-service dates for these identified enhancements? If there are none, please explain why.
- c. Please refer to page 9, lines 1 through 3. Please explain how FPUC currently communicates with communities where fieldwork is to be performed.

3.) Please refer to the direct testimony of witness Gadgil for the following questions:

- a. Please refer to page 8, lines 17 through 19. Please elaborate on the “industry standards and regulations” stated here. Please explain how the new SAP solution will ensure compliance with these standards and regulations.
- b. Please refer to page 9, line 5. Please provide the estimated implementation date for the NCIS.
- c. Please refer to page 9, lines 13 through 14. Please elaborate on the “industry benchmarks” referenced on these lines. Further, please explain how FPUC determined the additional costs for the NCIS are consistent with those benchmarks.

- d. Please refer to page 9, lines 18 through 19. Please explain in greater detail why FPUC believes that retaining the legacy platform would “lead to higher costs in the future.”
 - e. Please refer to page 10, lines 12 through 14. Please elaborate on the “industry-standard platform” that FPUC is currently in the process of selecting. Please also state when FPUC anticipates making its selection.
- 4.) Please refer to the direct testimony of witness Haffecke for the following questions:
- a. Please refer to page 10, lines 17 through 19. Please provide the estimated total capital cost and O&M expenses for the NCIS. As part of this response, please provide an itemized breakdown of what is included in the cost estimate.
 - b. Please refer to page 15, lines 19 through 20. Please explain where the dispatcher and/or management are located.
 - c. Please refer to page 15, lines 22 through 23. Please provide the communication range for the two-way radio system.
 - d. Please refer to page 16, lines 7 through 8. Please provide the estimated implementation date for the two-way radio system.
 - e. Please refer to page 16, line 10. Please provide the estimated total O&M expenses for the two-way communication system. As part of this response, please provide an itemized breakdown of what is included in the cost estimate.
 - f. Please refer to page 18, line 10. Please provide the estimated total cost of the security cameras. As part of this response, please provide an itemized breakdown of what is included in the cost estimate.

- g. Please refer to page 18, lines 14 through 16. Please provide the estimated implementation date for the security cameras. As part of this response, please provide the number of substations and operation offices that would have security cameras installed along with the number of security cameras.
 - h. Please refer to page 20, lines 12 through 15 provide the estimated total O&M expenses associated with the security system service and plan monitoring. As part of this response, please provide a description of what the security system service and plan monitoring includes and an itemized breakdown of what is included in the cost estimate.

- 5.) Please refer to the direct testimony of witness Napier for the following questions:
 - a. Please refer to page 23, lines 12 through 13. Please provide FPUC projections for the account to be underfunded.
 - b. Please refer to page 23, lines 14 through 15. Please provide FPUC projections for the increase in the reserve and expenses.
 - c. Please refer to page 25, lines 20 through 21. Please provide an example of how the Technology Cost Recovery Rider (TCRR) will be used.

Staff's Tenth Data Request

October 31, 2024

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Please file all responses electronically no later than Thursday, November 14, 2024, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless
Suzanne Brownless
Special Counsel

SBr/ds

cc: Office of Commission Clerk