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# Public Service Commission

November 1, 2024

## STAFF'S ELEVENTH 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](mailto: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 refer to Florida Public Utilities Company's (FPUC or Company) Responses to Staff's Fifth Set of Data Requests, response No. 3, for the following request. Please explain how the Company ensures that any work performed by native FPUC staff is separated by retail/jurisdictional work versus rate case work that would be charged to rate case expense.
2. Please refer to the total of line 9 of Minimum Filing Requirements (MFR) Schedule C-7 (2023), page 1 of 4, and the total of line 9 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Supervision and Engineering operating & maintenance" (O&M) expense over 2023.

3. Please refer to the total of line 14 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 14 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Operation Supervision & Eng" O&M expense over 2023.
4. Please refer to the total of line 15 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 15 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Load dispatching" O&M expense over 2023.
5. Please refer to the total of line 16 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 16 of MFR schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Station Expenses" O&M expense over 2023.
6. Please refer to the total of line 16 of MFR Schedule C-7 (2024), page 1 of 4, and the total of line 16 of MFR Schedule C-7 (2025), page 1 of 8, for the following request. Please explain the factor(s) that lead to the increase in 2025 "Station Expenses" O&M expense over 2024.
7. Please refer to the total of line 17 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 17 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Operation of Overhead Lines" O&M expense over 2023.

8. Please refer to the total of line 25 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 25 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Distribution Expenses" O&M expense over 2023.
9. Please refer to the total of line 25 of MFR Schedule C-7 (2024), page 1 of 4, and the total of line 25 of MFR Schedule C-7 (2025), page 1 of 8, for the following request. Please explain the factor(s) that lead to the increase in 2025 "Distribution Expenses" O&M expense over 2024.
10. Please refer to the total of line 24 of MFR Schedule C-7 (2023), page 1 of 4, and the total of line 24 of MFR Schedule C-7 (2024), page 1 of 6, for the following request. Please explain the factor(s) that lead to the increase in 2024 "Misc Distribution O&M" expense over 2023.
11. Please refer to the total of line 24 of MFR Schedule C-7 (2024), page 1 of 4, and the total of line 24 of MFR Schedule C-7 (2025), page 1 of 8, for the following request. Please explain the factor(s) that lead to the increase in 2025 "Misc Distribution" O&M expense over 2024.

12. Please refer to MFR Schedule C-35, page 1 of 1, for the following requests.
- a) Please refer to line 9. Please explain the factor(s) that lead to the increase in 2023 “Medical Insurance” benefit amount.
  - b) Please refer to line 14. Please explain the factor(s) that lead to the increase in 2024 “Worker’s Compensation” benefit amount.
  - c) Please refer to line 16. Please explain the factor(s) that lead to the increase in 2025 “401K” benefit amount.
  - d) Please refer to line 18. Please explain the factor(s) that lead to the decrease in 2023 “Relocation Expenses”.
  - e) Please refer to line 19. Please explain the factor(s) that lead to the decrease in 2023 “Retiree Benefits”.
  - f) Please refer to line 20. Please explain the factor(s) that lead to the increase in 2023 “Other health-related benefits”.
  - g) Please refer to line 20. Please explain the factor(s) that lead to the decrease in 2024 and 2025 “Other health-related benefits”.
  - h) Please refer to line 21. Please explain the factor(s) that lead to the increase in 2023 “Other benefits” over 2022 and the decrease in 2024 “Other benefits” over 2023.
  - i) Please refer to line 21. Please detail and explain what costs are being recorded to “other benefits” for the 2023, 2024, and 2025 test years.

Staff's Eleventh Data Request

November 1, 2024

Page 5

Please file all responses electronically no later than Friday, November 15, 2024, through the Commission's website at [www.floridapsc.com](http://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](mailto: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