

November 8, 2024

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**BY E-FILING**

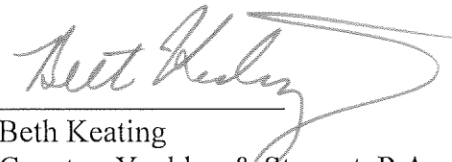
Mr. Adam Teitzman, Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**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 Ninth Set of Data Requests.

Sincerely,



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

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FPUC'S RESPONSES TO STAFF'S NINTH SET OF DATA REQUESTS

1. Please refer to Florida Public Utilities Company's (FPUC or Company) Minimum Filing Requirements (MFRs), Schedule D-1a and Schedule D1-a (Supplement) for the 2025 projected test year, Column K, labeled "Interest Expense," for the following requests:
  - a) In Schedule D-1a, please explain why the total interest expense does not equal the sum of the above components in the column.
  - b) In Schedule D-1a and Schedule D1-a (Supplement), please explain why both interest expenses associated with long term debt are equal despite having different long term debt cost rates.
  - c) In Schedule D-1a and Schedule D1-a (Supplement), please provide the interest calculations under Column K for long term debt, short term debt, customer deposits, and the total interest expense.

**Company Response:**

- a. **The amounts in column K were hard coded from the last rate case filing and not changed to a formula. Please refer to the attached file for correction of the filing. The filed revenue requirement is overstated by \$732,820. Please refer to the attached DR 9.1a and b.**

**b. Please refer to DR 9.1a above.**

**c. Please refer to DR 9.1a above.**

2. Please refer to Direct Testimony of FPUC witness Michelle Napier, page 18, lines 3 through 9, for the following requests:
  - a) Please provide a citation for where the interest and income tax synchronization adjustment and its calculation can be found within the MFRs and electronic MFRs.
  - b) Please provide a step-by-step breakdown of the calculation used to achieve the \$5,950 interest synchronization adjustment.

**Company Response:**

- a. **The interest synchronization formulas are in the Excel version of the MFR's on the C-1 (2023), (2024), and 2025 file on line 54 columns F-I. On the schedules, after the interest synchronization adjustments are made, the amount needed should come to zero. There may be \$1.00 shown due to rounding.**
  - b. **Please refer to file DR 9.2b Interest Sync Calculation for the formulas.**
3. Please provide details on the estimated additional project cost of \$587,280 for the General Ledger System CWIP that can be found on MFR Schedule B-13, page 2 of 2.

**Company Response:**

**This amount was based on a very early estimate of the ERP project costing \$29,504,881 before the full extent of the project was determined. This amount was allocated at 6% to electric when this early estimate was made. As discussed in the response to Staff's Data Request 8 number 5, the ERP estimate is not complete. In addition, the amount in construction work in process was removed from rate base on MFR B-1 because it**

**included an allowance for funds used during construction in the estimate. Therefore, it is not included in the calculation of base rates.**

**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 8th day of November, 2024:

<p>Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:sbrownle@psc.state.fl.us">sbrownle@psc.state.fl.us</a> <a href="mailto:discovery-gcl@psc.state.fl.us">discovery-gcl@psc.state.fl.us</a></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 <a href="mailto:Trierweiler.Walt@leg.state.fl.us">Trierweiler.Walt@leg.state.fl.us</a> <a href="mailto:Wessling.Mary@leg.state.fl.us">Wessling.Mary@leg.state.fl.us</a> <a href="mailto:Rehwinkel.Charles@leg.state.fl.us">Rehwinkel.Charles@leg.state.fl.us</a> <a href="mailto:Christensen.patty@leg.state.fl.us">Christensen.patty@leg.state.fl.us</a> <a href="mailto:Ponce.octavio@leg.state.fl.us">Ponce.octavio@leg.state.fl.us</a> <a href="mailto:Watrous.austin@leg.state.fl.us">Watrous.austin@leg.state.fl.us</a></p>
<p>Michelle Napier Florida Public Utilities Company 1635 Meathe Drive West Palm Beach FL 33411 <a href="mailto:mnapier@fpuc.com">mnapier@fpuc.com</a></p>	

By: \_\_\_\_\_



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