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Public Service Commission

November 15, 2024

STAFF'S FIFTEENTH 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. Has FPUC made the appropriate adjustments to remove all storm hardening revenues and expenses recoverable through the SPPCRC for the 2025 projected test year?
 - a) Please explain how FPUC made the appropriate test year adjustments to remove revenues and expenses recoverable through the SPPCRC and where this is shown in the filings.
 - b) Explain how TECO ensures that there is no double recovery between base rate revenue and SPPCRC revenue.

- c) Does TECO have an audit process to ensure that the methodologies used to track costs recovered through its various storm hardening and protection riders, including the SPPCRC, are appropriately implemented and followed? If not, why not?
 - d) What percentage of TECO's storm hardening revenue and expense is recovered through the SPPCRC and what percentage is recovered through base rates?
2. Provide a description of the methodology(ies) used by FPUC to track costs recovered through the SPPCRC, and exclude them from the components of the base revenue requirement in this proceeding.
 3. Please identify all SPPCRC includable costs that FPUC recorded, by account, in 2023 and expects to record in 2024 and 2025.

Please file all responses electronically no later than Monday, December 2, 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