

STATE OF FLORIDA

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Public Service Commission

December 13, 2024

STAFF'S TWENTIETH 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 refer to MFR Schedule B-13, page 3, line numbers 15, and 21 through 28 for the following questions.
 - a) For purposes of clarity, please list the total estimated cost for each project. If this amount differs from the amount provided in column (4) of this schedule, please explain why for each.
 - b) For each project, please indicate if an economic analysis, such as a cumulative present value revenue requirement analysis or other cost-effectiveness analysis, was completed. If so, please provide the results of the analysis. If not, please explain why.

2. Please refer to MFR Schedule C-7(2025), page 1, lines 8 through 27, page 3, lines 68 through 71, and page 5, lines 72 through 84. Please provide a general explanation of how FPUC typically estimates projected transmission and distribution O&M expenses.
3. Please refer to MFR Schedule C-7(2025), page 3, lines 68 through 71, and page 5, lines 72 through 84. Please provide a brief description of what is included in the costs for each of the transmission and distribution maintenance categories.
4. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 1 for the following questions.
 - a) Regarding the blanket projects, please indicate if the Commission has previously approved similar projects for FPUC. If so, please identify the Commission order(s) approving those projects.
 - b) Regarding the replacements of NW Florida substations, please identify the typical service life and the current age of the assets to be replaced.
5. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 2. For each project listed below, please explain why the total cost provided in the associated Excel file response differs from the value provided for the test year on MFR Schedule B-11.
 - a) AIP Substation.
 - b) JL Terry Substation.

6. Please refer to FPUC's responses to Staff's Sixth Set of Data Requests, Nos. 2 and 12. For each of the projects that include contingency costs, please explain how these amounts were determined. As part of this response, please identify the percentage of the overall project cost that the contingency cost amounts to for each project.
7. Please refer to FPUC's responses to Staff's Sixth Set of Data Requests, Nos. 2 and 22(b). Regarding the purchase of NW Florida substations project, please indicate if the final purchase contract has been completed. If so, please provide the contracted purchase price for each of the listed substation assets.
8. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 5. Please describe FPUC's established purchasing guidelines for purchases or services below the O&M and capital amounts in Chesapeake Utilities Corporation's purchase policy.
9. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 7. Regarding the purchase of NW Florida Substations project, please provide the results of the analyses conducted for the alternatives listed. As part of this response, please provide a cost comparison between the total cost of purchasing the NW Florida substation assets and the total cost associated with each identified alternative.

10. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 11 for the following questions.
 - a) Regarding the Self Healing project, please indicate how often FPUC typically experiences energy supply interruptions. As part of this response, please provide examples of instances when this project would be utilized.
 - b) Regarding the SD Substation 69 KV Loop and Switch project, please explain why backup transmission service to the substations on Amelia Island is necessary, and detail the modifications to the Step Down Substation that would occur. As part of this response, please indicate whether or not other backup transmission service is currently available to the substations on Amelia Island.

11. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 12 for the following questions.
 - a) Multiple projects include "Labor – ES&I" in the sheet titled "COST" and under the "Breakdown of Job Costs" category. Please define "ES&I".
 - b) For the SD Substation 69 KV Loop and Switch and Substation Upgrades projects, please explain why the total cost provided in the associated Excel file response for each project differs from the value provided on MFR Schedule B-13, column (4).
 - c) Regarding the Substation Upgrades project, please identify what percentage of the costs provided in the DR 6.12 Stepdown Cost and DR 6.12 Bypass Loop Excel files are included in MFR Schedule B-13, column (4), for each.

- d) For purposes of clarity, please provide the total estimated cost for the manhole project.
12. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 18. For each of the projects listed below, please explain in detail how denial of each project will have a direct negative impact on the reliability of FPUC's electric system.
- a) Self Healing Project.
 - b) SD Substation 69 KV Loop and Switch.
 - c) Substation Upgrades.
 - d) Minor Projects.
13. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 22(b). Regarding the purchase of NW Florida Substations project, please explain why the estimated cost of \$4.2 million differs from the estimated cost of \$4.9 million as provided in MFR Schedule B-11 for the test year, and MFR Schedule B-13, column (4), for this project.
14. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 23(i). Please explain why the total cost provided in the Excel file response for the NW Florida IMC Technician differs from the value provided for this position on MFR Schedule C-7 (2024, 2025), page 7.

15. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 23(m). Please list the procedures FPUC is attempting to comply with as it relates to the replacement of aging equipment and rebuilds of the AIP and JL Terry substations.
16. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 24(a). For purposes of clarity, please identify the substation to be rebuilt referenced in the direct testimony of witness Haffecke, page 16, lines 14 through 17.
17. Please refer to FPUC's response to Staff's Sixth Set of Data Requests, No. 27(c). Please provide a salary breakdown for each line supervisor position similar to the format provided in the Microsoft Excel file titled "DR 6.6 GM450 engineering increase".

Please file all responses electronically no later than Friday, December 27, 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