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Public Service Commission

December 17, 2024

STAFF'S TWENTY FIRST 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 FPUC's response to Staff's Fourth Set of Data Requests, Question No. 10, Excel file titled, "DR 4.1 Weather Normalization Forecasts(35111451.1)," tab "NE Hist Data – MFR." Please state whether the Company agrees that staff's calculations shown in the table, listed on the following page, accurately depict FPUC's average annual residential customers and resulting growth rates for the Northeast service territory. If not, please explain why not.

| | NE Residential Customers (12 mo. Avg.) | Percent Growth (Y/O/Y) | Average Historical Growth (2016-2023) |
|--------|--|------------------------|---------------------------------------|
| 2015 | 13,910 | - | |
| 2016 | 14,091 | 1.31% | |
| 2017 | 14,322 | 1.64% | |
| 2018 | 14,518 | 1.37% | |
| 2019 | 14,806 | 1.99% | |
| 2020 | 15,188 | 2.58% | |
| 2021 | 15,343 | 1.02% | |
| 2022 | 15,440 | 0.63% | |
| 2023 | 15,599 | 1.03% | 1.44% |
| 2024* | 15,645 | 0.30% | |
| 2025** | 15,690 | 0.29% | |

*Includes 4 months of actual data and 8 months of forecasted data

**Test Year

2. If the Company's answer to Question No. 1 is affirmative, please reference the table above and explain why FPUC's 2024 and 2025 residential customer growth projections for the NE service area are lower than any other year in the historical period as well as substantially lower than the average growth rate experienced from 2016-2023.

3. Please refer to FPUC's response to Staff's Fourth Set of Data Requests, Question No. 2(c). FPUC states that customer growth for the Northeast Residential class was estimated to be 0.1 percent per month, which would equate to approximately 1.2 percent growth annually. Since FPUC's forecasted annual growth rate for the Northeast Residential class was 0.29 percent, please explain the apparent contradiction between these growth figures.

4. Please refer to FPUC's response to Staff's Fourth Set of Data Requests, Question No. 10, Excel file titled, "DR 4.1 Weather Normalization Forecasts(35111451.1), tabs "Northeast Forecast Detail" and "Northwest Forecast Detail." Please explain the cause(s) for the relatively high error rates between actuals and forecasts for the following:
 - NE Residential UPC – June 2024 (11.7%)
 - NE Commercial Small UPC – June 2024 (14.1%)
 - NE Commercial UPC – June 2024 (13.3%)
 - NW Residential UPC – August 2024 (11.7%)

5. Please refer to Page 7, Line 23 of witness Taylor's Direct Testimony, where it appears there is a word or phrase omitted after the word "during." Please amend.

6. Please refer to FPUC's response to Staff's Fourth Set of Data Requests, Question No. 2(e). Please identify and provide the data that the utility relied upon in its determination that electricity demand is relatively price inelastic in the short term.

7. Please provide the company's monthly residential price (at 1000 kwh or average usage - please specify) for the period January 2015 to December 2025 – historic and forecasted, with forecasted prices based on FPUC's proposed base rates, beginning April 2025 and approved clause rates beginning Jan 2025.

8. Please refer to FPUC's response to Staff's Fourth Set of Data Requests, Question No. 12, Excel file titled, "DR 4.1 Weather Normalization Forecasts (35111451.1)."
 - a) Referring to the tabs titled "NW - Residential," "NW – Commercial Small," and "NW – Commercial," please explain why the fit lines and error rates were omitted for the time period January 2015 to December 2018 for these UPC models, reducing each model to 64 observations.
 - b) Referring to the tab titled "NE – Commercial Small," please explain why this UPC model omits January 2015 – December 2019, reducing the model to 52 observations.
 - c) Referring to the tab titled "NW – Residential," please explain the (963) kwh UPC data point entry for November 2018.
 - d) Referring to the tab titled "NW Hist Data – MFR," under the Residential billed column, the data point entry for November 2018 is a negative (9,593,612) kwh. Please explain how this negative data point entry is possible. Please also explain how the data point entry for December 2018 is 23,464,792 kwh which is significantly higher than any other month, historical and forecasted. Please also explain in detail how the data points for these two successive months vastly differ.
 - e) For the Northwest service territory, if the historical data for the months of October 2018, November 2018, and December 2018 were influenced or distorted greatly by the effects of Hurricane Michael, please explain whether FPUC considered other modelling options to represent those three months in the UPC models (e.g. binary variables, data adjustments, etc), as an alternative to omitting all data point entries for

the months prior to and surrounding Hurricane Michael (January 2015 – December 2018).

Please file all responses electronically no later than Tuesday, December 31, 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