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Writer's Direct Dial Number: (850) 521-1706  
Writer's E-Mail Address: bkeating@gunster.com

**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 23<sup>rd</sup> Set of Data Requests. Please note that certain referenced attachments that are available only in Excel format are not included for filing but will be provided to the service list separately.

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 TWENTY THIRD SET OF DATA REQUESTS

1. In response to staff's tenth data request, FPUC indicated it is still testing out the range of its proposed radio system. Please explain how the radio system will adequately cover FPUC's service territory. As part of your response, please explain what alternative communication systems were evaluated, if any.

**Company Response:**

**As part of the project, FPUC commissioned and just recently received the completed radio propagation study to ensure reliable radio coverage would be available over the entire electrical service territory. Changes in the vendors organization created the delay which pushed back the completion date for this project. The actual geographical electric service territories were provided to the vendor and, based on the coverage necessary, radio repeaters and antennas will be placed at strategic locations to ensure adequate, reliable inbound and outbound communications from different types of devices. Prior to beginning this project to install radios, the company explored options using cell phone technology to provide communications in place of radios. Although cell phones do work well in most situations, cell phone service after severe storms has not worked effectively which is when the communications are needed the most. Additionally, there are times during certain operations where it is necessary to communicate information to a large group of personnel. In this situation, radios work well at doing this where cell phone use**

**during this type of activity was very difficult. The company also evaluated which type of radios worked most effectively electric operations where consideration for working during inclement weather is required.**

2. On MFR Schedule B-13, page 4 of 87, FPUC budgeted \$800,000 for the cost of the radio system. However, on page 15 and 16, line 10 of witness Haffecke's testimony, the cost of the radio system is \$1.3M. Please identify the total cost of the radio system and provide an itemized breakdown of what is included in the total cost.

**Company Response:**

**MFR B-13 was only related to the open projects that had a balance in construction work in progress in 2025. The \$800,000 was the budgeted amount for the Northeast part of the system which was projected to be closed in 2025. There was a separate project forecast for the Northwest part of the system for \$500,000 which was expected to be closed in December 2024. However, given the radio vendor's organization changes, this project will now be completed in the first quarter of 2025. The two projects total the \$1.3 million. However, as mentioned in Item #1 above, the radio propagation study was just recently completed which will push completion of the project into the first quarter of 2025.**

3. Please refer to witness Haffecke's testimony, page 16, lines 6 through 8 and MFR Schedule B-13, page 4 of 87, Radio system (line 33). For purposes of clarity, please explain if both project names used are associated with one project. If not, please explain the difference.

**Company Response:**

**Internally, projects are usually named separately for the Northeast and Northwest divisions. In our forecast for the rate case, the radio projects were reported separately for each division with one closing in December 2024 and one in March 2025.**

4. Please refer to the direct testimony of witness Napier testimony page 22, lines 14 through 18. Please provide the estimated storm reserve charge per 1,000 kWh with FPUC's requested storm accrual increase of \$446,979.

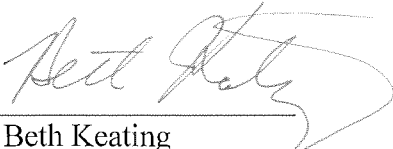
**Company Response:**

**The increase in storm reserve costs in the filing are incorporated into the base rate calculation based on the cost of service study. But, if these were included separately as a storm surcharge, the charge for a year per 1,000 kWh would be \$0.7282 or \$0.0607 per month.**

**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 30th day of December, 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:   
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
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