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STATE OF FLORIDA



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Public Service Commission

January 13, 2025

STAFF'S TWENTY EIGHTH 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 E-13c, titled “Base Revenue By Rate Schedule – Calculations,” and FPUC’s supplemental response to Staff’s Fourth Set of Data Requests, Question No. 12, Excel file titled, “DR 4.1 Weather Normalization Forecasts - with Annual (002)(35386069.1) (SUPPLEMENTAL),” tab titled “Annual Summary.” Please confirm the following rate classes appearing in MFR Schedule E-13c are the following rate classes appearing in the Excel file:
 - a) Residential Service = Residential
 - b) General Service = Commercial Small
 - c) General Service Demand = Commercial

2. Please refer to MFR schedule E-13c, titled "Base Revenue By Rate Schedule – Calculations." For each customer class listed below, and by division (Northeast, Northwest), please provide FPUC's annual actual customers and UPC for 2015 through 2023, annual actual/forecast of customers and UPC for 2024, and annual forecast of customers and UPC for 2025 for the following rate classes. Please provide this data in Excel format similar to the data provided in FPUC's supplemental response to Staff's Fourth Set of Data Requests, Question No. 12, Excel file titled, "DR 4.1 Weather Normalization Forecasts - with Annual (002)(35386069.1) (SUPPLEMENTAL)," tab titled "Annual Summary."
 - a) General Service Large Demand (GSLD)
 - b) General Service Large Demand1 (GSLD1)
 - c) Lighting Service (OL and SL)

3. Please refer to MFR schedule E-13c, titled "Base Revenue By Rate Schedule – Calculations." For each applicable customer class, and by division (Northeast, Northwest), please provide FPUC's annual actual demand (KW) for 2015 through 2023, annual actual/forecast of demand for 2024, and annual forecast of demand for 2025.

4. Please refer to MFR Schedule F-5, page 1 of 3, titled, "Forecasting Models." The third paragraph on this page appears to address FPUC's models for peak demand for the GSD and GSLD rate classes. These models do not appear alongside the UPC models in MFR Schedule F-7, pages 1-6 of 21. Please provide equivalent information regarding the demand models similar to that provided for the UPC models.

5. Please refer to MFR Schedule F-5, page 1 of 3, titled, "Forecasting Models." The fourth paragraph on this page appears to address FPUC's methodology for forecasting billing determinants for the GSLD1 rate class. FPUC states that a "direct" forecast of KWH purchases, billed KW demand, and kVar were utilized. Please explain, in more specific terms, the methodology used.

Please file all responses electronically no later than Monday, January 27, 2025, 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