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OFFICE OF THE GENERAL COUNSEL
KEITH C. HETRICK
GENERAL COUNSEL
(850) 413-6199

Public Service Commission

January 14, 2025

STAFF'S THIRTIETH 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:

For the following questions, please refer to the direct testimony of witness Haffecke, beginning on page 22.

1. Please explain why FPUC's proposed flat rate recovery method is preferable over the existing variable rate.
2. Please explain why FPUC is proposing a flat rate for the recovery of Hurricane Michael costs for the GSLD1 customer class only.
3. Please demonstrate how FPUC's proposal to charge a flat rate will not have an impact on the total recovery of the surcharge.

4. Please explain whether FPUC has had conversations with GSLD1 customers about the proposed change from variable rate to flat rate.

5. Please explain any benefit to either the GSLD1 customer or FPUC associated with the proposed change to a flat rate recovery method.

Please file all responses electronically no later than Tuesday, January 21, 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