

January 21, 2024

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BY E-FILING

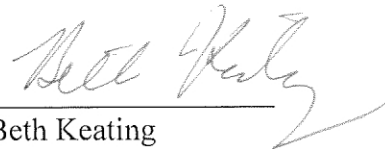
Mr. Adam Teitzman, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20240099-EI - Petition for rate increase by Florida Public Utilities Company

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Public Utilities Company, please find the Company's responses to Staff's 30th Set of Data Requests.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Beth Keating', written over a horizontal line.

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

FPUC'S RESPONSES TO STAFF'S THIRTIETH SET OF 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.

COMPANY RESPONSE:

When the Company implemented the Experimental Non-Firm Energy Tariff, the GSLD1 customers began using less regular usage and more non-firm energy usage which was billed separately. This resulted in less storm revenue than was projected in the original filing for the Hurricane Michael docket. Since the Experimental Non-Firm Energy Tariff will still be in effect, at least until the one year expires, the change to a flat rate was proposed to ensure recovery of storm revenue.

2. Please explain why FPUC is proposing a flat rate for the recovery of Hurricane Michael costs for the GSLD1 customer class only.

COMPANY RESPONSE:

Please refer to the response to item 1. GSLD1 and Standby customers are the only ones that the Experimental Non-Firm Energy tariff applied to, and the Company is requesting Standby be merged into the GSLD1 tariff.

3. Please demonstrate how FPUC's proposal to charge a flat rate will not have an impact on the total recovery of the surcharge.

COMPANY RESPONSE:

The proposed flat rate was calculated to ensure that only the amount originally requested in the Hurricane Michael docket for industrial customers would be recovered.

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

COMPANY RESPONSE:

Yes, the customers are aware of the change. If the customers' total usage was to continue at the current level of both their firm and non-firm usage after expiration of the non-firm tariff, this change will benefit the customer.

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

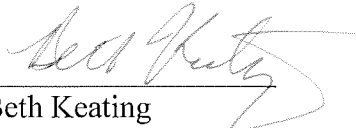
COMPANY RESPONSE:

Please see the response to item 4 above for the benefit to the customer, which occurs after the expiration of the non-firm tariff. The benefit to the Company is full collection of the amount originally requested in the Hurricane Michael docket even if the customers switch their usage from firm to non-firm. This does not harm the customer as the Company is only seeking to recover what the Commission has already approved.

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 21st day of January, 2025:

<p>Suzanne Brownless Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us discovery-gcl@psc.state.fl.us</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 Trierweiler.Walt@leg.state.fl.us Wessling.Mary@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.patty@leg.state.fl.us Ponce.octavio@leg.state.fl.us Watrous.austin@leg.state.fl.us</p>
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