

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 32nd Set of Data Requests.

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

FPUC'S RESPONSES TO STAFF'S THIRTY SECOND SET OF DATA REQUESTS

1. Please explain in detail how the Company's pricing structure operates with respect to transmission and distribution charges that are associated with its Purchase Power Agreement (PPA) for Northwest Florida.

Company Response:

Currently FPU receives a Network Transmission Bill from FPL monthly. This bill is a single consolidated bill that contains billing from both the NE FL and NW FL divisions. Although this is a consolidated bill, the details from both NE FL and NW FL are shown separately. The NW FL detail shows the network transmission billing, meter reading and processing charge and the distribution facilities charge. These charges are included in the total wholesale power purchase and network transmission billing bill that are included in the annual purchased power filing.

The structure of the Network Transmission billing is based on two separate contracts, one for NW FL and one for NE FL that are then combined into a single bill for accounting purposes.

The Network Integration Transmission Service Agreement and Network Operating Agreement between FPL and FPU for the NW FL was executed August 5, 2022 and will continue until December 31, 2029. This agreement sets the following as the billing parameters for this agreement with cost defined by the FPL Open Access Transmission

Tariff (OATT). The kw-month amount used below is determined using the FPU KW demand value coincident with the FPL system peak.

Schedule 1 – Transmission Charge (\$/kw- month)

Schedule 2 – Reactive Supply and Voltage Control from Generation or Other Sources Service (\$/kw- month)

Schedule 4 – Energy Imbalance (\$/kw- month)

Schedule 10 – Losses (\$/kw- month)

FERC Assessment Fees (\$/kwh)

Network Meter Reading and Processing Fee (\$/meter)

Distribution Facilities Charge (\$/month)

2. By what specific method and point in time will the relevant distribution charges associated with the PPA for Northwest Florida cease being assessed to FPUC?

Company Response:

FPU and FPL are currently working through the details to enable modifications to the substations to allow the sale of the substations to FPU. There will be four substations which currently have distribution facility charges to FPU on a monthly basis. As these modifications are completed and the sale occurs for each substation, the distribution facilities charges will be dropped from the monthly transmission billing. Although each substation sale may occur at different times, the goal is for all four substations to become part of FPU by the end of 2025.

3. Were any projected savings associated with the Northwest Florida substations included in the 2025 fuel factor? If so, what was that projected savings amount?

Company Response:

The savings associated with the NW FL substation was included in the 2025 Fuel Factor.

The projected savings amount was \$1,380,657.

4. Will the Company's current PPA require re-negotiation in order to achieve the savings alluded to in FPUC's response to interrogatory No. 12¹?

Company Response:

Although we do plan to consolidate all the Network Transmission Billing into one agreement, there is nothing required to achieve the savings.

5. Has the projected fuel clause-related savings amount of \$1.4 million been updated since the filing of interrogatory response No. 12? If so, what is the new projected savings amount?

Company Response:

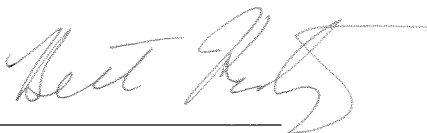
No, the projected savings have not been updated.

¹ It is not clear what Interrogatory 12 is referenced here. As such, respondent has assumed that the referenced interrogatory is Interrogatory No. 12, in Staff's Fifth Set of Interrogatories to the Company in Docket No. 202400001-EI.

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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