

January 23, 2025

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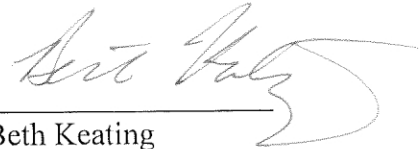
Mr. Adam Teitzman, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

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 31st Set of Data Requests.

Sincerely,



Beth Keating
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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 FIRST SET OF DATA REQUESTS

For the following questions, please refer to the direct testimony of witness

Haffecke, beginning on page 22.

1. Please refer to the direct testimony of witness Haffecke, page 13, lines 17 through 19.

Please indicate if there are any potential cost savings, O&M or otherwise, associated with the replacement and rebuild of FPUC's Northeast substations, JL Terry and AIP. Please quantify these savings, if possible. If there are no savings associated with these projects, please explain why.

Company Response:

The intent of these projects is focused more on reliability as opposed to a reduction in expense. The FPU maintenance program is a time-based program which is intended to perform maintenance on equipment prior to operational issues or failure. Maintenance on the substation equipment varies, depending on the equipment, but can occur monthly, quarterly, annually, five years or 10 years and is independent of the age of the equipment. Assuming the plan works as intended, equipment is maintained during the normal time schedule and then removed from service prior to operational issues or failure so there is no added expense. There will be the occasional failure that occurs but this is an extremely small percentage of the overall maintenance cost.

2. Please refer to the direct testimony of witness Haffecke, page 16, lines 14 through 17.

Please explain why FPUC did not elect to seek recovery of the self healing equipment through the Storm Protection Plan Cost Recovery Clause.

Company Response:

The self-healing equipment was proposed in the 2022 FPU SPP initial filing. During the hearings it was determined by the Commission that this type of project was more appropriate to be included in an electric rate proceeding and was removed from the final approved SPP.

3. Please refer to the direct testimony of witness Haffecke, page 16, lines 20 through 21, and FPUC's response to Staff's Sixth Data Request, No. 25 for the following questions.

- a) Please confirm that the manhole removal project consists of the replacement of eroding fibercrete vaults inside the manholes and explain how the Utility determined the vaults were eroding.
- b) Please explain what FPUC uses the fibercrete manhole vaults for.
- c) If additional activities outside of replacement of the fibercrete vaults are being conducted under this project, please identify these activities, how these activities were determined to be needed, and identify what costs requested are associated with them.

Company Response:

- a. **Yes, the project consists of replacing eroding fibercrete vaults. During work to**

relocate manholes due to a road relocation project, it was identified that the sides of the manholes were collapsing in toward the center of the manhole. When attempting to remove the manholes, the entire manhole collapsed and was not able to be removed.

b. The manhole vaults are used in conjunction with underground distribution feeders. The manholes allow the cable to be pulled from one location to another using the vaults at these locations or allow for splicing of separate cables that are being connected.

c. This project was only associated with the replacement of the fibercrete manhole vaults that have failed in service.

4. Please refer to FPUC's response to Staff's Sixth Data Request, No. 2. Regarding the Excel file provided for the new 75 MVA transformer installation project, please explain how the retirement amount was determined for the 50 MVA transformer. As part of this response, please identify the MFR schedule reflecting this retirement amount.

Company Response:

The \$10,000 credit shown on this schedule was the estimated salvage, not the actual retirement. The \$10,000 salvage estimate was based on a quote received for a similar unit. The salvage was not properly included as a credit to accumulated depreciation but, instead decreased the projected plant addition recorded.

The Company did project a \$250,000 retirement related to this project for December of 2025 based on the estimated original cost of the transformer being

retired. The amount can be found in MFR B-7 (2025) in account 353E as part of the \$305,200 retirement and included in the balances in B-8 (2025) for the same plant account. It can also be found on B-9 (2025) in the same account for accumulated depreciation and included in the balances in B-10 for the same account.

5. Please refer to FPUC's response to Staff's Sixth Data Request, No. 6(a). Please identify how much of the \$61,041 allocation to electric expense is internal employee costs, and how much is material costs. As part of this response, please detail what materials will be included in the material costs.

Company Response:

The amount is all internal employee costs. There were no material costs.

6. Please refer to FPUC's response to Staff's Sixth Data Request, No. 13. Please explain how FPUC selected the 10 live front projects.

Company Response:

Each year, FPU conducts an inspection of the pad-mounted equipment in order to assess the condition of the equipment and identify any issues that may have occurred since the prior inspection. The intent is to complete the replacement of live front equipment over time while using the inspection information as a basis for the selections. In order to determine the live front equipment to be replaced, the condition of the equipment along with the efficiency of replacing the equipment is considered when selecting the appropriate equipment to be

replaced.

7. Please refer to FPUC’s response to Staff’s Sixth Data Request, No. 27(f).
Please detail the “other tasks” that other personnel will be able to focus on with the addition of the Line Supervisor positions.

Company Response:

The “other tasks” are related to management items such as strategic planning, evaluation of operating/construction efficiencies, addressing operations issues, and supervising employees, etc.

8. Please refer to FPUC’s response to Staff’s Twentieth Data Request, No. 10(b) for the following questions.
 - a) Please indicate if other backup transmission service is currently available at the stepdown substation. If so, please identify the backup transmission service that is currently available, and explain why the installation of the 69 kV underground cable and switches is also necessary.
 - b) Please explain how FPUC currently minimizes interruptions to customers served by the stepdown substation during maintenance activities.

Company Response:

- a) **We do not have backup service. The Step-Down substation takes 138 KV transmission service from FPL. That voltage is stepped down to 69 KV in order to provide service to three different distribution substations. One 69 KV line**

goes radially to the AIP substation which provides service to the south end of Amelia Island. If the line is out of service, there is no other back up line to keep the power on while repairs are made. The second 69 KV line goes to the JL Terry Substation that serves the north part of Amelia Island. This line does have a partial back up loop that allows the ability to keep the power on while approximately half the line is out of service. The third 69 KV line provides service to the distribution section of the Step Down substation. This section of Step Down substation provides service to the central part of Amelia Island. Due to a recent Step Down substation switch failure, it was necessary to remove one of the main transformers from service. Since it is impossible to replace the switch in the current configuration, the substation capacity was reduced by 37.5% even though load requirements have increased with the cold weather. The Company has a plan to build a temporary, back-up 69 KV line which will allow the replacement of the switch and bring the capacity of the substation back to 100%. This temporary line will serve the same purpose as the 69 KV loop and switch project. With the completion of this project, the current issue and other similar issues within the substation can be avoided.

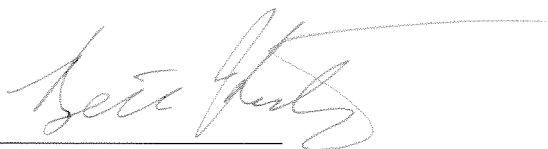
b) As described in 8a above, it is necessary and possible to put temporary poles and wire in place in certain areas of the Step Down substation to make some repairs without causing power interruption. However, there are other locations in the Step Down substation where it is not possible to place poles and wire to construct temporary facilities. Should maintenance or a repair be necessary at these locations, with no back up facilities in place and placement of temporary

facilities not an option, an outage would need to be scheduled during low load periods, such as at night or on weekends. Notifications regarding the planned outage would be made to customers via the FPUC website or direct mailings noting the time that maintenance or repairs are to occur. The Company notes that installing and removing temporary facilities results in increased costs; therefore a permanent backup is preferred.

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 23rd 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>
<p>Michelle Napier Florida Public Utilities Company 1635 Meathe Drive West Palm Beach FL 33411 mnapier@fpuc.com</p>	

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