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# Public Service Commission

January 28, 2025

## STAFF'S THIRTY THIRD 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](mailto: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 witness Russell's direct testimony. On page 11, line 15, witness Russell explained that Florida Public Utilities Company's (FPUC) calculation of the interest rate of 4.51 percent only includes 21 percent of the six debt issuances totaling \$550 million used to finance the purchase of Florida City Gas (FCG).
  - a) Please explain how the Company determined 21 percent relates to funding overall FPUC operations and is appropriate for calculating the embedded cost of debt for FPUC.
  - b) How much of the \$550 million debt was used to purchase FCG?

Staff's Thirty Third Data Request

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Please file all responses electronically no later than Friday, January 31, 2025, through the Commission's website at [www.floridapsc.com](http://www.floridapsc.com), by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to [discovery-gel@psc.state.fl.us](mailto:discovery-gel@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