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January 29, 2025

**VIA E-PORTAL**

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

**Re: Docket No. 20250020-GU – IN RE: Adoption of new Rule 25-7.150, [FAC], Natural Gas Facilities Relocation Cost Recovery Clause.**

Dear Mr. Teitzman:

Attached for filing, please find the Joint Responses to Florida Public Utilities Company and Florida City Gas to Commission Staff's Statement of Estimated Regulatory Costs (SERC) data request.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,

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

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
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Tallahassee, FL 32301  
(850) 521-1706

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Adoption of new Rule 25-7.150, [FAC], Natural Gas Facilities Relocation Cost Recovery Clause. || DOCKET NO. 20250020-GU  
Filed: January 29, 2025

JOINT RESPONSE TO FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA CITY GAS TO STAFF'S DATA REQUEST REGARDING STATEMENT OF ESTIMATED REGULATORY COSTS

Consistent with staff's letter of January 16, 2025, please find the joint responses of Florida Public Utilities Company and Florida City Gas (jointly herein "Companies") to the SERC questions posed.

1. Referring to Rule 25-7.150, (1), F.A.C., regarding providing supportive testimony with details of the facilities to be relocated and their associated costs, please provide the estimated cost to comply with this task.

Companies' Response:

The Companies estimate initial costs of complying with Rule 25-7.150 sections (1) through (3) (e) to be approximately \$40,000. This includes testimony, notifications, preparation of the true up, the annual filing including the calculation of its proposed cost recovery factors, legal and maintenance of subaccounts. After the initial year, the Companies expect costs will decrease.

2. Referring to Rule 25-7.150, (2)(a), F.A.C., regarding notification, please provide the estimated cost to provide the information to the PSC.

Companies' Response:

Please refer to Response 1 above.

3. Referring to Rule 25-7.150, (2)(b), what is the estimated cost to prepare a description of the scope of the facilities relocation to be undertaken per the requirements imposed by the authority?

Companies' Response:

Please refer to Response 1 above.

4. Referring to Rule 25-7.150 (2)(c), please provide the estimated cost to your utility to prepare an estimate of the costs associated with the relocation of the natural gas facilities.

Companies' Response:

Please refer to Response 1 above.

5. What is the estimated cost to annually file your utility's NGFRCRC petition as prescribed in Rule 25-7.150(3)(a) through (e), F.A.C.?

Companies' Response:

Please refer to Response 1 above.

6. With reference to Rule 25-7.150(5), F.A.C., what is the estimated cost to your utility to maintain subaccounts for all item subject to cost recovery using the NGFRCRC, consistent with the Uniform System of Accounts prescribed by the PSC pursuant to Rule 25-7.014, F.A.C.?

Companies' Response:

Please refer to Response 1 above.

7. Would the proposed new Rule 25-7.150, F.A.C., directly or indirectly result in new regulatory costs to your utility in excess of \$200,000 in the aggregate in Florida within 1 year after implementation of the rule?

Companies' Response:

The estimated cost of implementation of this rule is not expected to exceed \$200,000. The estimate in Response to 1 above, includes projected regulatory costs to the utilities.

A “Small Business” is defined by Section 288.703, F.S., as an independently owned and operated business concern that employs 200 or fewer permanent full-time employees and that, together with its affiliates, has a net worth of not more than \$5 million or any firm based in this state, which has a Small Business Administration 8(a) certification. As to sole proprietorships, the \$5 million net worth requirement shall include both personal and business investments.

8. Considering the above stated definition of a Small Business, please state if your natural gas utility is a small business.

Companies’ Response: No, they are not.

9. If yes, please state if the proposed new rule would have an adverse, minimal, or no financial impact on your utility.

Companies’ Response: No, it would not.

10. Would the proposed new rule have an adverse financial impact on economic growth, private-sector job creation or employment, and private-sector investment in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Companies’ Response: No, it would not.

11. Would the proposed new rule have an adverse financial impact on business competitiveness, productivity, and innovation in excess of \$1 million in the aggregate within 5 years after implementation of the rule?

Companies’ Response: No, it would not.

12. Would the proposed new rule result in new regulatory costs, including any transactional costs (Transactional costs” include filing fees, the cost of obtaining a license, the cost of equipment

required to be installed or used, procedures required to be employed in complying with the rule, additional operating costs incurred, the cost of monitoring or reporting, and any other costs necessary to comply with the rule) to your utility, in excess of \$1 million in the aggregate within 5 years after the implementation of the rule? If yes, please explain.

Companies' Response: No, it would not.

A "Small City" is defined by Section 120.52, F.S., as any municipality that has an unincorporated population of 10,000 or less according to the most recent decennial census. A "small county" is defined by Section 120.52, F.S., as any county that has an unincorporated population of 75,000 or less according to the most recent decennial census.

13. Considering the above definition of a Small City, please state if your utility serves a small city or several small cities, or a small county/counties? Would the small city/cities/county/counties served by your utility have financial impacts or no impacts due to the proposed rule revisions?

Companies' Response: Both FPUC and FCG serve several "small cities" and some "small counties". The Companies are not aware of any financial impact that either small cities or small counties might incur.

14. Please provide any additional information, including any tasks not identified above, which would result in new costs to you, the utility, due to the proposed new rule, which the Commission may determine useful. [Section 120.541(2)(f), F.S.]

Companies' Response: None.

**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 29th day of January, 2025:

Florida Public Utilities Company Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 W: (561) 838-1712 <a href="mailto:mnapier@fpuc.com">mnapier@fpuc.com</a>	J. Jeffry Wahlen Malcolm Means Virginia Ponder Ausley & McMullen P.O. Box 391 Tallahassee, FL 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a> <a href="mailto:vponder@ausley.com">vponder@ausley.com</a>
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