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February 19, 2025

ELECTRONIC FILING

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
Betty Easley Conference Center
2540 Shumard Oak Boulevard, Room 110
Tallahassee, Florida 32399-0850

RE: Docket No. 20240099EI – Petition for Rate Increase by Florida Public Utilities Company – Request of the City of Marianna, Jackson County, and the Jackson County School Board to be Included as Interested Parties/Persons and to Address the Commission at Agenda Conference

Dear Mr. Teitzman:

The City of Marianna, Jackson County, and the Jackson County School Board have engaged my law firm to represent their interests in the general rate case initiated by Florida Public Utilities Company, which is currently being processed as a Proposed Agency Action ("PAA") proceeding. By this letter, on behalf of my above-named clients, I request that each client be added to the Commission's list of Interested Persons in this docket, and I also request that the Commission acknowledge that persons representing and affiliated with each of these governmental entities intend to address the Commission at its agenda conference on March 4, 2025, at which the Commission is scheduled to consider the Staff's recommendation for proposed action on FPUC's requested rate increases. I also request that this letter be placed in the correspondence file for this docket. The following paragraphs provide relevant background and summarize the interests of the City, the County, and the School Board in this case.

The City of Marianna, Jackson County, and the Jackson County School Board all serve the citizens of Jackson County and are committed to serving and protecting the public interest of those they serve. The City provides many services to its citizens; these services include police protection and services, fire and rescue services, parks and recreation

opportunities, water, sewer, and natural gas utility services, waste management services, city road maintenance, and other municipal services. Jackson County likewise provides extensive services to the citizens and businesses of Jackson County. Services provided by the County include law enforcement, fire protection and rescue, utilities other than electricity, roads and transportation, correctional facility services, agricultural support, community development, library, parks and recreational opportunities, services to veterans, and other services. The Jackson County School Board operates 13 schools that currently serve 5,600 students.

All three government entities receive electric service from FPUC under a range of retail service tariffs, including General Service, General Service Demand, General Service Large Demand, and lighting service tariffs. All three are substantial retail customers and ratepayers of FPUC. The City has 118 retail service accounts and paid FPUC approximately \$730,000 in Fiscal Year 2024. The County has approximately 102 retail service accounts and paid FPUC \$862,586 in Fiscal Year 2024. The School Board has approximately 78 retail service accounts with FPUC for which the School Board paid FPUC approximately \$1.6 million in Fiscal Year 2024. Therefore, the substantial interests of the City, the County, and the School Board will be affected by any increase in rates approved by the Florida Public Service Commission (“Commission” or “PSC”) in this proceeding.

The City, the County, and the School Board provide critical and necessary services to their citizens, businesses and visitors at the lowest possible cost consistent with fulfilling their statutory obligations and their general mandate to serve the public interest. These governments require electric service at the lowest possible cost consistent with meeting appropriate safety and reliability standards. In the public interest, the City, the County, and the School Board strongly believe that, as a public utility charged with serving the public interest, FPUC must also provide service at the lowest possible cost consistent with meeting appropriate safety and reliability standards. Based on preliminary review of FPUC’s requested increases, the City, the County, and the School Board believe that FPUC is requesting substantially more than it needs to make all necessary investments and to recover all reasonable and necessary operating and maintenance expenses of providing safe and reliable service.

Given the procedural posture of this docket, i.e., as a PAA proceeding, the City, the County, and the School Board will closely review the Staff’s recommendation and make appropriate comments when they address the Commission at the March 4 agenda conference. The City, the County, and the School Board will also closely review any PAA order subsequently issued by the Commission and make their decisions whether to request a hearing based on the facts of their circumstances and the specific provisions of the anticipated PAA order. At present, the City, the County, and the School Board strongly believe that FPUC’s requested increases are excessive and contrary to the public interest.

Accordingly, if the Commission were to propose approving increases of the magnitudes requested by FPUC, they would demand a hearing.

Thank you very much for including the representatives of the City, the County, and the School Board as Interested Persons in the Commission's docket records and for acknowledging the intent of these entities that serve the people of Jackson County to address the Commission at its agenda conference on March 4, 2025. I have attached a list of the persons who should be included on your Interested Persons list; please include me and my law partner, John Thomas LaVia III, as well.

Cordially yours,


Robert Scheffel Wright

Attachment

Copies: Commissioner Mike LaRosa
Commissioner Gary F. Clark
Commissioner Andrew Giles Fay
Commissioner Art Graham
Commissioner Gabriella Passidomo Smith
Suzanne Brownless, Esquire
Beth Keating, Esquire
Walt Trierweiler, Esquire

FLORIDA PUBLIC SERVICE COMMISSION DOCKET NO. 20240099-EI

**PETITION FOR RATE INCREASE BY FLORIDA PUBLIC UTILITIES
COMPANY**

**PARTIES & PERSONS TO BE INCLUDED ON INTERESTED PERSONS
LIST FOR THE CITY OF MARIANNA, JACKSON COUNTY, FLORIDA,
AND THE JACKSON COUNTY SCHOOL BOARD**

City of Marianna, Florida
William Long, City Manager
City Hall
2895 Jefferson Street
Marianna, Florida 32446
850-718-1008
wlong@mariannafl.city

Jackson County, Florida
Wilanne Daniels, County Administrator
2864 Madison Street
Marianna, Florida 32448
850-482-9633
danielsw@jacksoncountyfl.gov

Jackson County School Board
Hunter Nolen, Superintendent
2903 Jefferson Street
Marianna, Florida 32446
850-482-1200
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