



May 16, 2025

Writer's Direct Dial Number: (850) 521-1706
Writer's E-Mail Address: bkeating@gunster.com

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, please find the FPUC's Responses to Staff's 34th Set of Data Requests.

Sincerely,

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

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Cc: (Parties)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida Public Utilities Company. | DOCKET NO. 20240099-EI

FPUC'S RESPONSE TO STAFF'S 34TH SET OF DATA REQUESTS

1. Please refer to the Stipulation and Settlement Agreement (Settlement), filed in Docket No. 20240099-EI, Section III. "Revenue Requirement," for the following request.¹ Will a carrying charge apply to any amounts potentially deferred as indicated in subsection c.? If so, what will be the carrying charge?

COMPANY RESPONSE:

There will not be a carrying charge applied to the deferred amount.

2. Please refer to the Settlement, Section III. "Revenue Requirement," subsection d. for the following requests.
 - a. Does this section imply that the Company will apply a weighted average cost of capital of 6.36 percent to an actual investment balance related to the relevant substation and transmission assets, but, will not seek to implement an annual revenue requirement amount in excess of \$727,778?

COMPANY RESPONSE:

Yes, the Company will apply a weighted average cost of capital of 6.36% to an actual investment balance related to the relevant substation and transmission assets up to an annual revenue requirement of \$727,778.

- b. If the response to subpart a. is affirmative, staff understands the revenue requirement figure of \$727,778 was calculated using a cost of equity of 10.15 percent. Please explain how the Company will achieve the same (or less than) revenue requirement while assessing a higher cost of capital than originally estimated.

COMPANY RESPONSE:

The \$727,778 was based on projected costs. If the costs are higher, the amount recoverable through the step increase will be capped at the \$727,778, and the Company will not earn its

¹ Document No. 03457-2025.

allowed return on that additional cost until the next rate case. If the amount is lower, the amount submitted for recovery through the step increase will be less than the \$727,778 based on the actual costs. The potential for a temporary under-recovery was not material enough to cause an issue in settlement negotiations.

3. Please refer to the Settlement, Section VIII. "Rate Case Expense" for the following request. Is staff correct that this this section amends the previous 4-year (originally requested 3-year) rate case expense amortization period?

COMPANY RESPONSE:

The Company originally requested a 4-year amortization period. At the March 4, 2025, Agenda conference, OPC requested that a 5-year amortization period be applied. The Company stated it would not object to the period be extended to 5 years. The Settlement reflects the 5-year amortization period included in Commission Order No. PSC-2025-0114-PAA-EI, at page 55, and the Company will use that period to amortize the actual balance of rate case costs at completion of the case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Data Responses have been furnished by Electronic Mail to the following parties of record this 16th day of May, 2025:

Office of Public Counsel Walter Trierweiler/Charles Rehwinkel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.Walt@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us Wessling.Mary@leg.state.fl.us Ponce.Octavio@leg.state.fl.us Watrous.Austin@leg.state.fl.us	Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 W: (561) 838-1712 mnapier@fpuc.com Matt Everngam Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 meverngam@chpk.com
Suzanne Brownless Florida Public Service Commission Office of General Counsel 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 sbrownle@psc.state.fl.us discovery- gc@psc.state.fl.us	Robert Scheffel 11Schef11 Wright John T. LaVia, III Gardner, Bist, Bowden, Dee, LaVia, Wright, Perry & Harper, P.A. 1300 Thomaswood Drive Tallahassee, Florida 32308

By: /s/Beth Keating
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706