State of Florida



Hublic Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE:

July 17, 2008

TO:

Daniel Q. Lee, Engineering Specialist IV, Division of Economic Regulation

FROM: Denise N. Vandiver, Chief of Auditing, Division of Regulatory Compliance & Jan Landon Consumer Assistance

RE:

Docket No: 080002-EG; Company Name: Florida Public Utilities Company;

Audit Purpose: Electric Energy Conservation Clause Audit; Company Code: EI803;

Audit Control No: 08-037-4-1:

Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of Commission Clerk. There are no confidential work papers associated with this audit.

DNV:sbi Attachments

Copy: Division of Regulatory Compliance and Consumer

Assistance (Hoppe, District Offices, File Folder -6)

Division of Commission Clerk (2)

Division of Competitive Markets and Enforcement (Harvey)

General Counsel

Office of Public Counsel

Mr. Mehrdad Khojasteh Florida Public Utilities Co.

P.O. box 3395

West Palm Beach, FL 33402-3395

Messer Law Firm

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Tallahassee, FL 32317

DOCUMENT NUMBER-DATE

06188 JUL 178

FPSC-COMMISSION OF FOR



FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE BUREAU OF AUDITING

Miami District Office

Florida Public Utilities Company Electric Energy Conservation Clause Audit

Twelve Months Ended December 31, 2007

DOCKET #080002-EG AUDIT CONTROL NO. 08-037-4-1

Kathy L. Welch

Audit Manager

Iliana Piedra

Regulatory Analyst

DOCUMENT NUMBER - DATÉ

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FPSC-COMMISSION CLERK

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FPSC-COMMISSION CLERK

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE AUDITOR'S REPORT

July 3, 2008

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures enumerated later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request. We have applied these procedures to the attached schedules, prepared by Florida Public Utilities Company, in support of its filing for electric conservation docket 080002-EG.

This audit is performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use.

OBJECTIVES AND PROCEDURES:

Objective: The objective of the audit was to reconcile the schedules to each other and to the general ledger.

Procedures: We prepared a trial balance using the general ledger and reconciled all conservation accounts to the filing.

Objective: The objective was to verify that the true-up was calculated correctly.

Procedures: We agreed the beginning true-up provision to the last order and workpapers. We prepared a recalculation using the filing and Commission approved interest rates.

Objective: The objective of the audit was to determine that the company has applied the approved conservation cost recovery factors to actual therm sales and properly calculated revenues.

Procedures: We determined that the conservation rate in the last order times the kilowatts sold equaled the conservation revenue in the filing. We then verified that some bills selected at random used the ordered rates.

Objective: The objective of the audit was to determine that the actual energy conservation program expenses filed by the company agree with source documentation and meet the requirements of the programs.

Procedures: We reconciled the filing to the general ledger detail. We selected a random sample of vouchers recorded in the general ledger and traced them to source documentation. Audit finding one discusses a car wrap that should have been fully allocated to electric. Audit finding two discusses a mailing for new electric rates charged 85% to conservation. Audit finding three discusses a retainer for public relations expense.

We verified that the incentives paid by voucher met the program guidelines.

We reviewed the payroll to determine that employees hours charged to conservation agreed to job descriptions in the last audit. We questioned the utility about new employees. We reviewed the overhead rate for consistency with the last audit.

AUDIT FINDING NO. 1

SUBJECT: CAR WRAP

AUDIT ANALYSIS: Florida Public Utilities paid \$6,549.75 to Signs for Tomorrow for a car wrap around two Chevy Trucks used in the electric divisions. The wrap advertises the conservation programs. The invoice was charged 46% to gas and 54% to electric divisions. According to a company representative the costs should be 100% electric.

EFFECT ON GENERAL LEDGER: The following entry should be made to the ledger but not included in next years filing costs:

114.4010.909-Marianna Conservation Advertising	\$1,506.45	\$
115.4010.909-Fernandina Conservation Advertising	1,506.44	
121.4010.909 West Palm Cons. Advertising		1,506.45
123.4010.909 Brevard Conservation Advertising		1,506.45

EFFECT ON FILING: Electric costs should be increased by \$3,012.89 and interest of \$110 for a total reduction to the over-recovery of \$3,123.

INTEREST	JANUARY E	EBRUARY M.	ARCH	APRIL	MAY	JUNE	JULY	AUGUSTS	EPTEMBER (OCTOBERN	OVEMBERDI	ECEMBER	
RATES													
Beginning	5.270%	5.260% 5	.260%	5,260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%	
Ending	5,260%	5.260% 5	.260%	5.260%	5.260%	5.280%	5,240%	5.620%	5.050%	4.720%	4.750%	4.980%	
Total	10,530%	10.520% 10	.520%	10.520%	10.520%	10.540%	10.520%	10.860%	10,670%	9.770%	9.470%	9.730%	
Average	5.265%	5,260% 5	.260%	5.260%	5.260%	5.270%	5.260%	5.430%	5.335%	4.885%	4.735%	4.865%	
Monthly Average	0.439%	0.438% 0	.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%	
·													
CALCULATION OF TRUE-UP	JANUARY F	EBRUARY M	ARCH	APRIL	MAY	JUNE	JULY	AUGUSTS	SEPTEMBER (OCTOBER N	OVEMBERD	ECEMBER	TOTAL
						-							
Total Conservation Revenues (line 3)	-39,001	-39,348 -3	35,999	-34,580	-35,584	-40,197	-49,938	-51,478	-47,603	-44,842	-33852	-34260	-486,682
(1/12) of Prior True-Up (4) (A)	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-3,718	-44,616
Total conservation revenue current period	-42,719	-43,066 -3	39,717	-38,298	-39,302	-43,915	-53,656	-55,196	-51,321	-48,560	-37,570	-37,978	-531,298
Conservation Cost	27,271	28,178	45,138	78,077	45,303	40,278	26,297	43,152	54,531	53,964	45,475	30,371	518,035
True-up this period	-15,448	-14,888	5,421	39,779	6,001	-3,637	-27,359	-12,044	3,210	5,404	7,905	-7,607	-13,263
Interest provision (line 8)	-221	-272	-278	-164	-48	-27	-79	-154	-155	-110	-66	-52	-1,626
Adj. to interest prov.(a)	0	0	0	0	0	0	0	0	0	0	0	0	0
Deferred true-up beginning (9a)		0	0	0	0	0	0	0	0	0	0	0	0
True-up & interest beginning (9) (A)	-44,616	-56,567 -0	68,010	-59,149	-15,816	-6,145	-6,091	-29,810	-38,290	-31,517	-22,505	-10,948	-44,616
Regulatory asses. fee adj (9b)	0	0	0	0	0	0	0	0	0	0	0	0	Q
Prior true-up collected ref. (10) (A)	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	44,616
Total net true-up over-recovery (under)	-56,567	-68,010 -	59,149	-15,816	-6,145	-6,091	-29,810	-38,290	-31,517	-22,505	-10,948	-14,889	-14,889
True-up for the month per filing	-56,567	-68,009	59,148	-18,835	-9,177	-9,136	-32,869	-41,363	-34,603	-25,603	-14,058	-18012	-18,012
Difference is due to rounding	0	1	-1	3,019	3,032	3,045	3,059	3,073	3,086	3,098	3,110	3,123	3,123
					-								
CALCULATION OF INTEREST													
Beginning true up and interest	-44,616	-56,567 -6	010,88	-59,149	-15,816	-6,145	-6,091	-29,810	-38,290	-31,517	-22,505	-10,948	
Ending true-up before int	-56,346	-67,737 -5	58,871	-15,652	-6,097	-6,064	-29,732	-38,136	-31,362	-22,395	-10,882	-14,837	
Total	-100,962	-124,305 -12	26,881	-74,801	-21,913	-12,209	-35,823	-67,947	-69,652	-53,912	-33,386	-25,784	
Average true up	-50,481	-62,152 -6	63,440	-37,401	-10,957	-6,105	-17,911	-33,973	-34,826	-26,956	-16,693	-12,892	
Interest rate per above	0.439%	0,438% 0	,438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0,407%	0.395%	0.405%	
Interest per staff	-221	-272	-278	-164	-48	-27	-79	-154	-155	-110	-66	-52	-1,626
Interest per filing	-221	-272	-278	-171	-61	-40	-92	-168	-168	-122	-78	-65	-1,736
Difference is due to rounding	0	0	0	7	13	13	13	14	13	12	12	13	110

AUDIT FINDING NO. 2

SUBJECT: RATE INCREASE MAILING

AUDIT ANALYSIS: Florida Public Utilities paid \$5,267 for postage to mail a notice of rate increase from docket 070304-EI. Approximately 65% of the notice related to recommending the customers use the conservation programs to reduce their bills. The utility charged 85% of the postage to conservation and the rest to regulatory expense.

The difference of 20% would reduce conservation expenses by \$1,053.40. Interest on the difference amounts to \$21.

EFFECT ON GENERAL LEDGER: The following entry should be made to the ledger:

114.4010.928 Marianna Regulatory Expense	\$ 526.70	\$
115.4010.928 Fernandina Regulatory Expense	526.70	
114.4010.909 Marianna Conservation Advertising		526.70
115.4010.909 Fernandina Conservation Advertising		526.70

EFFECT ON FILING: Costs should be reduced by \$1,053.40 and interest reduced by \$21. The net increase to the over-recovery is \$1,074.40.

INTEREST RATES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	
Beginning	5.270%	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%	
Ending	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%	4.980%	
Total	10.530%	10.520%	10.520%	10.520%	10.520%	10.540%	10,520%	10,860%	10.870%	9.770%	9.470%	9.730%	
Average	5.265%	5.260%	5.260%	5.260%	5.260%	5.270%	5.260%	5.430%	5.335%	4.885%	4.735%	4.865%	
Monthly Average	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%	
CALCULATION OF TRUE-UP	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECÉMBER	TOTAL
Total Conservation Revenues (line 3)	-39,001	-39,348	-35,999	-34,580	-35,584	-40, 197	-49,938	-51,478	-47,603	-44,842	-33852	-34260	-486,682
(1/12) of Prior True-Up (4) (A)	-3,718		-3,718	-3,718	-3,718	-3,718	-3,718	-3,718		-3,718	-3,718	-3,718	-44,616 0
Total conservation revenue current period	-42,719	-43,066	-39,717	-38,298	-39,302	-43,915	-53,656	-55,196	-51,321	-48,560	-37,570	-37,978	-531,298
Conservation Cost •	27,271	28,178	45,138	75,064	45,303	40,278	26,297	42,099	54,531	53,964	45,475	30,371	513,969
True-up this period	-15,448		5,421	36,766	6,001	-3,637	-27,359	-13,097	3,210	5,404	7,905	-7,607	-17,329
Interest provision (line B)	-221	-272	-278	-171	-61	-40	-92	-170		-127	-82	-69	-1,757
Adj. to interest prov.(a)	0		. 0	0	0	0	0	0		0	0	0	0
Deferred true-up beginning (9a) True-up & interest beginning (9) (A)	-44,618	0 -58,567	0 -68,010	0 -59,149	0 -18,836	0 -9,178	0 -9,137	0 070		0	0 000	0	0
Regulatory asses, fee adj (9b)	-44,010 0		-00,010	-33,149	-10,036 Q	-9,176 Q	-9,137 G	-32,870 0		-35,664 0	-26,669 0	-15,128 0	-44,616 0
Prior true-up collected ref. (10) (A)	3,718		3,718	3,718	3,718	3,718	3,718	3,718		3,718	3,718	3,718	44,616
Total net true-up over-recovery (under)	-56,567	-68,010	-59,149	-18,836	-9,178	-9,137	-32,870	-42,419		-26,669	-15,128	-19,086	-19,086
True-up for the month per filing	-56,567	-68,009	-59,148	-18,835	-9,177	-9,136	-32,869	-41,363	-34,603	-25,603	-14,058	-18012	-18.012
Difference is due to rounding	0	-1	-1	-1	-1	-1	-1	-1,056	-1,061	-1,066	-1,070	-1,074	-1,074
CALCULATION OF INTEREST													
Beginning true up and interest	-44,616	-56,567	-68,010	-59,149	-18,836	-9,178	-9,137	-32,870	-42,419	-35,664	-26,669	-15,128	
Ending true-up before int	-56,346	-67,737	-58,671	-18,665	-9,117	-9,097	-32,778	-42,249	-35,491	-26,542	-15,048	-19,017	
Total	-100,962	-124,305	-126,881	-77,814	-27,952	-18,275	-41,915	-75,119	-77,910	-62,207	-41,715	-34,146	
Average true up	-50,481		-63,440	-38,907	-13,976	-9,137	-20,957	-37,559		-31,103	-20,857	-17,073	
Interest rate per above	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%	
Interest per staff	-221	-272	~278	-171	-61	-40	-92	-170		-127	-82		-1,757
Interest per filing	-221		-278	-171	-61	-40	-92	-168		-122	-78		-1.736
Difference is due to rounding		0	0	0	0	0	. 0	-2	-5	.5		-4	-21

AUDIT FINDING NO. 3

SUBJECT: PUBLIC RELATIONS RETAINER

AUDIT ANALYSIS: Starting in August 2007, Florida Public Utilities began paying a public relations firm a \$5,000 a month retainer. In 2007, \$25,000 was paid. The cost was split between the Marianna and Fernandina divisions conservation program costs. (Account 4010.909-Advertising) The retainer was paid to update the media campaign book, employee letter, newsletter, "Prepare for Higher Costs" news release and customer handouts.

The public relations firm also worked on the "Energy for Life" Home Performance Makeover which selected a needy family from each division and refit the customers home with energy efficient measures.

EFFECT ON GENERAL LEDGER: This finding is for informational purposes.

EFFECT ON FILING: This finding is for informational purposes.

EXHIBITS

COMPANY: FLORIDA PUBLIC UTILITIES - CONSOLIDATED ELECTRIC

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION SUMMARY OF EXPENSES BY PROGRAM BY MONTH

FOR MONTHS

January-07 THROUGH December-07

A.	CONSERVATION EXPENSE BY PROGRAM	JANUARY	FEBRUARY	MARCH	APRIL	MAY_	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.	Common Residential Geothermal Heat Pump GoodCents Home/Energy Star Program	13,894 0 5,791	12,012 0 6,380	17,560 0 6,866	37,517 0 4,609	15,633 0 3,066	9,175 0 (1,839)	15,058 0 5,421	34,340 0 1,953	21.172 0 2,039	22,198 0 3,638	17,242 0	17,684 D	TOTAL 0 0 0 0 0 0 0 0 0 0 233,483
13. 14, 15, 18. 17. 18, 19. 20, 21.	GoodCents Energy Survey Program GoodCents Loan Program GoodCents Commercial Building Program GoodCents Commercial Tech. Assist. Program Low Income Affordable Housing Builders & Providers Program Residential Heat and Cool Eff. Upgrade Program Residential Ceiling Insuation Upgrade Program Comm. Indoor Eff. Light. Rebate Program Educ./Conserv. Demo. And Devel. Program	4,738 (10) (265) 1,522 0 0 1,029 573 0	4,718 (10) 921 2,065 0 0 1,731 363 0	4,900 (20) 1,208 2,229 0 0 1,651 1,019 9,726	4,720 (10) 928 2,174 0 0 2,124 344 14,083 8,574	3,104 83 (3) 1,964 0 0 3,812 458 17,182 4	15,935 (10) 14,359 2,757 0 0 3,169 704 (4,172) 0	7,421 (10) 4,468 278 0 0 3,668 980 (10,768) 0	1,953 3,955 (10) 4,639 573 0 0 2,570 (173) (5,013) 318	15,043 (10) 8,740 926 0 0 5,182	3,638 9,136 (10) 12 1,712 0 0 6,577 1,697 9,004	4,313 7,015 (10) 8 296 0 0 2,912 1,054 12,846 0	925 7,645 (10) 3,257 0 0 3,521 1,417 (4,068)	43,361 88,111 (37) 38,272 16,494 0 0 37,946 9,894 38,622 8,876 0
21. 22.		27,271	28,178	45,138	75,084	45,303	40,278	26,297	43,152	54,531	53,964	45,475	30,371	515.022
23.	RECOVERABLE CONSERVATION EXPENSES	27,271	28,178	45,138	75,064	45,303	40,278	26,297	43,152	54,531	53,964	45,475	30,371	515,022

EXHIBIT NO.

DOCKET NO. 080002-EG

FLORIDA PUBLIC UTILITIES COMPANY
(MSS-1)
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SCHEDULE CT-3 PAGE 1 OF 3

SCHEDULE CT-3 PAGE 2 OF 3

COMPANY: FLORIDA PUBLIC UTILITIES - CONSOLIDATED ELECTRIC

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS

January-07 THROUGH December-07

В.	CONSERVATION REVENUES	JANUARY	FEBRUARY	MARCH	APRIL.	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1.	RESIDENTIAL CONSERVATION								-					0
2.	CONSERVATION ADJ. REVENUES	(39,001)	(39,348)	(35,999)	(34,580)	(35,584)	(40,197)	(49,938)	(51,478)	(47,603)	(44,842)	(33,852)	(34,260)	(486,682)
3.	TOTAL REVENUES	(39,001)	(39,348)	(35,999)	(34,580)	(35,584)	(40,197)	(49,938)	(51,478)	(47,603)	(44,842)	(33,852)	(34,260)	(486,682)
4.	PRIOR PERIOD TRUE-UP ADJ. NOT APPLICABLE TO THIS PERIOD	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(3,718)	(44,616)
5.	CONSERVATION REVENUE APPLICABLE	(42,719)	(43,066)	(39,717)	(38,298)	(39,302)	(43,915)	(53,656)	(55,196)	(51,321)	(48,560)	(37,570)	(37,978)	(531,298)
6.	CONSERVATION EXPENSES (FROM CT-3, PAGE 1, LINE 23)	27,271	28,178	45,138	75,064	45,303	40,278	26,297	43,152	54,531	53,964	45,475	30,371	515,022
7.	TRUE-UP THIS PERIOD (LINE 5 - 6)	(15,448)	(14,888)	5,421	36,766	6,001	(3,637)	(27,359)	(12,044)	3,210	5,404	7,905	(7,607)	(16,276)
8.	INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10)	(221)	(272)	(278)	(171)	(61)	(40)	(92)	(168)	(188)	(122)	(78)	(65)	(1,736)
9.	TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH	(44,616)	(56,587)	(68,009)	(59,148)	(18,835)	(9,177)	(9,136)	(32,869)	(41,363)	(34,603)	(25,603)	(14,058)	(44,616)
9A.	DEFERRED TRUE-UP BEGINNING OF PERIOD													
10.	PRIOR TRUE-UP COLLECTED (REFUNDED)	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	3,718	44,616
11.	TOTAL NET TRUE-UP (LINES 7+8+9+9A+10)	(56,567)	(68,009)	(59,148)	(18,835)	(9,177)	(9,136)	(32,869)	(41,363	(34,603)	(25,603	(14,058)	(18,012)	(18,012)

EXHIBIT NO.

DOCKET NO. 080002-EG

FLORIDA PUBLIC UTILITIES COMPANY
(MSS-1)

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SCHEDULE CT-3 PAGE 3 OF 3

COMPANY: FLORIDA PUBLIC UTILITIES - CONSOLIDATED ELECTRIC

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS

January-07 THROUGH December-07

C.	INTEREST PROVISION	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1.	BEGINNING TRUE-UP (LINE B-9)	(44,616)	(56,567)	(800,88)	(59,148)	(18,835)	(9,177)	(9,136)	(32,869)	(41,363)	(34,603)	(25,603)	(14,058)	(44,616)
2.	ENDING TRUE-UP BEFORE INTEREST (LINES 87+89+89A+810)	(56,346)	(67,737)	(58,870)	(18,664)	(9,116)	(9,096)	(32,777)	(41,195)	(34,435)	(25,481)	(13,980)	(17,947)	(16,276)
3.	TOTAL BEG. AND ENDING TRUE-UP	(100,962)	(124,305)	(126,880)	(77,812)	(27,951)	(18,273)	(41,913)	(74,064)	(75,798)	(60,084)	(39,583)	(32,005)	(60,892)
4.	AVERAGE TRUE-UP (LINE C-3 X 50%)	(60,481)	(62,152)	(83,440)	(38,906)	(13,976)	(9,137)	(20,956)	(37,032)	(37,699)	(30,042)	(19,792)	(16,003)	(30,446)
5.	INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	5.27%	5.26%	5.26%	5.26%	5.26%	5.26%	5.28%	5.24%	5.62%	5.05%	4.72%	4.72%	
6.	INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	5.26%	5.26%	5.26%	5.26%	5.26%	5.28%	5.24%	5.62%	5.05%	4.72%	4.72%	4.98%	
7.	TOTAL (LINE C-5 + C-6)	10.53%	10.52%	10.52%	10.52%	10.52%	10.54%	10.52%	10.86%	10.67%	9.77%	9.44%	· 9.70%	
8.	AVG. INTEREST RATE (C-7 X 60%)	5.27%	5.26%	5.26%	5.26%	5.26%	5.27%	5.26%	5.43%	5.34%	4.89%	4.72%	4.85%	
9.	MONTHLY AVERAGE INTEREST RATE	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.393%	0.404%	
10.	INTEREST PROVISION (LINE C-4 X C-9)	(221)	(272)	(278)	(171)	(61)	(40)	(92)	(168) (168)	(122)	(78)	(65)	(1,736)

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