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October 6, 2009

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BY HAND DELIVERY

Ms. Ann Cole, Director Commission Clerk and Administrative Services Room 110, Easley Building Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Docket No. 090001-EI

Dear Ms. Cole:

Enclosed for filing on behalf of Florida Public Utilities Company in the captioned docket are the following revised schedules for the Northwest (Marianna) Division:

Schedule E1, 2 pages Schedule E1-A, 1 page Schedule E2, 1 page Schedule E10, 1 page

These are being revised and refiled at the request of Staff to correct a minor error in the calculation used for the Northwest Division.

Since the numbers also are in the testimony, we are also refiling the Direct Testimony of Mark Cutshaw and Curtis D. Young.

These revisions do not affect the schedules for Fernandina Beach or any schedule not listed above.

Finally, when initially filed, we submitted a request for confidential treatment of a portion of these schedules and these revised schedules are filed subject to that request.

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DOCUMENT NUMBER-DATE

Ms. Ann Cole October 6, 2009 Page 2

Please indicate receipt of this document by stamping the enclosed extra copy of this letter.

Should you have any questions please do not hesitate to contact me. Thank you for your assistance in this matter.

Sincerely,

Norman H. Horton, Jr

NHH:amb Enclosures

cc: Mr. Sid Matlock

Mr. Curtis Young Mr. Mark Cutshaw Parties of Record

FLORIDA PUBLIC UTILITIES COMPANY

FUEL AND PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

SCHEDULE E1 PAGE 1 OF 2

ESTIMATED FOR THE PERIOD: JANUARY 2010 - DECEMBER 2010 revised 9_30_2009

MARIA	NNA (NORTHWEST DIVISION)	(a) DOLLARS	(b) MWH	(c) CENTS/KWH
1	Fuel Cost of System Net Generation (E3)		0	
2	Nuclear Fuel Disposal Costs (E2)			
3	Coal Car Investment			
4	Adjustments to Fuel Cost			
5	TOTAL COST OF GENERATED POWER (LINE 1 THRU 4)	0	0	0.0000
6	Fuel Cost of Purchased Power (Exclusive of Economy) (E7)		338,506	
7	Energy Cost of Sched C & X Econ Purch (Broker) (E9)			
8	Energy Cost of Other Econ Purch (Non-Broker) (E9)			
9	Energy Cost of Sched E Economy Purch (E9)			
10	Demand & Transformation Cost of Purch Power (E2)		338,506	
10a	Demand Costs of Purchased Power	*		
10b	Transformation Energy & Customer Costs of Purchased Power	*		
11	Energy Payments to Qualifying Facilities (E8a)			
12	TOTAL COST OF PURCHASED POWER (LINE 6 THRU 11)		338,506	
13	TOTAL AVAILABLE KWH (LINE 5 + LINE 12)		338,506	
14	Fuel Cost of Economy Sales (E6)			
15	Gain on Economy Sales (E6)			
16	Fuel Cost of Unit Power Sales (SL2 Partpts) (E6)			
17	Fuel Cost of Other Power Sales			
18	TOTAL FUEL COST AND GAINS OF POWER SALES	0	0	0.00000
19	Net Inadvertent Interchange			
20	TOTAL FUEL & NET POWER TRANSACTIONS		338,506	
	(LINE 5 + 12 + 18 + 19)			
21	Net Unbilled Sales	0 *	0	0.00000
22	Company Use	36,419 *	342	0.01145
23	T & D Losses	2,149,055 *	20,181	0.67584
24	SYSTEM MWH SALES		317,983	
25	Less Total Demand Cost Recovery	***		
26	Jurisdictional MWH Sales	24,320,371	317,983	7.64832
26a	Jurisdictional Loss Multiplier	1.00000	1.00000	
27	Jurisdictional MWH Sales Adjusted for Line Losses	24,320,371	317,983	7.64832
28	GPIF **			
29	TRUE-UP **	1,725,320	317,983	0.54258
30	TOTAL JURISDICTIONAL FUEL COST	26,045,691	317,983	8.19091
31	Revenue Tax Factor			1.00072
32	Fuel Factor Adjusted for Taxes			8.19681
33	FUEL FAC ROUNDED TO NEAREST .001 CENTS/KWH			8.197

^{*} For Informational Purposes Only

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^{**} Calculation Based on Jurisdictional KWH Sales

^{***}Calculation on Schedule E1 Page 2

FLORIDA PUBLIC UTLITIES COMPANY FUEL FACTOR ADJUSTED FOR

LINE LOSS MULTIPLIER

ESTIMATED FOR THE PERIOD: JANUARY 2010 - DECEMBER 2010 revised 9_30_2009

MARIANNA (NORTHWEST DIVISION)

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
				(1)/((2)*4,380)			(3)*(4)	(1)*(5)	(6)/Total Col. (6) (7)/Total Col. (7)
	Rate Schedule	KWH Sales	12 CP Load Factor	CP KW At Meter	Demand Loss Factor	Energy Loss Factor	CP KW At GEN.	KWH At GEN.	12 CP Demand Percentage	Energy Percentage
34	RS	134,655,000	61.971%	49,608.9	1.089	1,030	54,024.1	138,694,650	47.37%	42,35%
35	GS	27,821,000	64.200%	9,893.8	1.089	1.030	10,774.3	28,655,630	9.45%	8.75%
36	GSD	92,325,000	73.168%	28,808.7	1.089	1.030	31,372.7	95,094,750	27.51%	29.03%
37	GSLD	57,576,000	84.178%	15,616.0	1.089	1.030	17,005.8	59,303,280	14.91%	18.11%
38	OL, OL1	4,382,000	160.732%	622.4	1.089	1.030	677.8	4,513,460	0.59%	1.38%
39	SL1, SL2 & SL3	1,224,000	160.732%	173.9	1.089	1.030	189.4	1,260,720	0.17%	0.38%
40	TOTAL	317,983,000		104,723.7			114,044.1	327,522,490	100.00%	100.00%

		(10) 12/13 * (8)	(11) 1/13 * (9)	(12) (10) + (11)	(13) Fot. Col. 13 * (12	(14) (13)/(1)	(15) (14) * 1.00072 Demand Cost	(16)	(17) (15) + (16)
	Rate Schedule	12/13 Of 12 CP	1/13 Of Energy	Demand Allocation Percentage	Demand Dollars	Demand Cost Recovery		Other Charges	Levelized Adjustment
41	RS	43.72%	3.27%	46.99%				_	\$0.12293
42	GS	8.72%	0.67%	9.39%					\$0.12158
43	GSD	25.39%	2.23%	27.62%					\$0.11708
44	GSLD	13.76%	1.39%	15,15%					\$0.11285
45	OL, OL1	0.54%	0.11%	0.65%					\$0.09937
46	SL1, SL2 & SL3	0.16%	0.03%	0.19%					\$0.10018
47	TOTAL	92.29%	7.70%	99.99%					

Step Rate Allocation for Residential Customers

(18)

(19)

(21) (20)

	Rate				(19) * (20)	
	Schedule	Allocation	Annual kWh	Levelized Adj.	Revenues	
48	RS	Sales	134,655,000	\$0.12293	\$16,553,139	
49	RS	<= 1,000kWh/mo.	85,366,000	\$0.11927	\$10,181,569	
50	RS	> 1,000 kWh/mo.	49,289,000	\$0.12927	\$6,371,570	
51	RS	Total Sales	134,655,000		\$16,553,139	

⁽²⁾ From Gulf Power Co. 2003 Load Research results.

⁽⁴⁾ From Fernandina Rate Case.

FLORIDA PUBLIC UTILITIES COMPANY CALCULATION OF TRUE-UP SURCHARGE APPLICABLE TO LEVELIZED FUEL ADJUSTMENT PERIOD JANUARY 2009 - DECEMBER 2009 BASED ON SIX MONTHS ACTUAL AND SIX MONTHS ESTIMATED revised 9 30 2009

MARIANNA (NORTHWEST DIVISION)

Under-recovery of purchased power costs for the period January 2009 -
December 2009. (See Schedule E1-B, Calculation of Estimated
Purchased Power Costs and Calculation of True-Up and Interest
Provision for the Twelve Month Period ended December 2009;
(Estimated)

\$ 1,725,320

Estimated kilowatt hour sales for the months of January 2010 - December 2010 as per estimate filed with the Commission.

317,983,000

Cents per kilowatt hour necessary to collect under-recovered purchased power costs over the period January 2010 - December 2010.

0.54258

FLORIDA PUBLIC UTILITIES COMPANY MARIANNA (NORTHWEST DIVISION)

FUEL & PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

ESTIMATED FOR THE PERIOD: JANUARY 2010 - DECEMBER 2010 revised 9_30_2009

		(a)	(b)	(c) ESTIMATE	(d) ED	(e)	(f)	(g)	(h)	(i)	0	(k)	(1)	(m)	
LINE NO.		2010 JANUARY	2010 FEBRUARY	2010 MARCH	2010 APRIL	2010 MAY	2010 JUNE	2010 JULY	2010 AUGUST	2010 SEPTEMBER	2010 OCTOBER	2010 NOVEMBER	2010 DECEMBER	TOTAL PERIOD	LINE NO.
1 1a 2 3 3a	FUEL COST OF SYSTEM GENERATION NUCLEAR FUEL DISPOSAL FUEL COST OF POWER SOLD FUEL COST OF PURCHASED POWER DEMAND & TRANSFORMATION CHARGE OF PURCHASED POWER	VANVOAKT	TEURONIT	WAREI	ALIME	MOJ	30142	3021	740001	JET TEMBET	OCTOBER	NOVEMBER	DECEMBER	0 0 0	1 1a 2 3 3a
3b 4	QUALIFYING FACILITIES ENERGY COST OF ECONOMY PURCHASES													0 0	3b 4
5	TOTAL FUEL & NET POWER TRANSACTIONS (SUM OF LINES A-1 THRU A-4)		-												5
6	LESS: TOTAL DEMAND COST RECOVERY														6
7	TOTAL OTHER COST TO BE RECOVERED	2,059,861	2,024,492	1,981,503	1,501,328	1,674,727	2,140,706	2,486,702	2,420,294	2,317,393	2,093,226	1,715,069	1,905,070	24,320,371	7
7a	SYSTEM KWH SOLD (MWH)	26,941	26,468	25,895	19,492	21,803	28,019	32,636	31,750	30,376	27,387	22,341	24,875	317,983	7a
7b	COST PER KWH SOLD (CENTS/KWH)	7.64582	7.64883	7.65207	7.70228	7.68118	7.64019	7.61951	7.62297	7.62903	7.64314	7.67678	7.65857	7.64832	7 b
8	JURISDICTIONAL LOSS MULTIPLIER	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	8
9	JURISDICTIONAL COST (CENTS/KWH)	7.64582	7.64883	7.65207	7.70228	7.68118	7.64019	7.61951	7.62297	7.62903	7.64314	7.67678	7.65857	7.64832	9
10	GPIF (CENTS/KWH)														10
11	TRUE-UP (CENTS/KWH)	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	0.54258	11
12	TOTAL	8.18840	8.19141	8.19465	8.24486	8.22376	8.18277	8.16209	8.16555	8.17161	8.18572	8.21936	8.20115	8.19090	12
13	REVENUE TAX FACTOR 0.0007	2 0.00590	0.00590	0.00590	0.00594	0,00592	0,00589	0.00588	0.00588	0.00588	0.00589	0.00592	0.00590	0,00590	13
14	RECOVERY FACTOR ADJUSTED FOR TAXES	8.19430	8.19731	8.20055	8.25080	8.22968	8.18866	8.16797	8.17143	8.17749	8.19161	8.22528	8.20705	8.19680	14
15	RECOVERY FACTOR ROUNDED TO NEAREST .001 CENT/KWH	8.194	8.197	8.201	8.251	8.230	8.189	8.168	8.171	8.177	8.192	8.225	8.207	8.197	15

EXHIBIT NO. DOCKET NO. 090001-EI
FLORIDA PUBLIC UTILITIES COMPANY MC-4 REVISED
PAGE 4 OF 5

FLORIDA PUBLIC UTILITIES COMPANY MARIANNA (NORTHWEST DIVISION)

RESIDENTIAL BILL COMPARISON FOR MONTHLY USAGE OF 1000 KWH

ESTIMATED FOR THE PERIOD: JANUARY 2010 - DECEMBER 2010 revised 9_30_2009

	JANUARY 2010	FEBRUARY 2010	MARCH 2010	APRIL 2010	MAY 2010	JUNE 2010	JULY 2010
BASE RATE REVENUES ** \$	32.36	32.36	32.36	32.36	32.36	32.36	32.36
FUEL RECOVERY FACTOR CENTS/KWH	11.93	11.93	11.93	11.93	11.93	11.93	11.93
GROUP LOSS MULTIPLIER	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000
FUEL RECOVERY REVENUES \$	119.27	119.27	119.27	119.27	119.27	119.27	119.27
GROSS RECEIPTS TAX	3.89	3.89	3.89	3.89	3.89	3.89	3.89
TOTAL REVENUES *** \$	155.52	155.52	155.52	155.52	155.52	155.52	155.52

1	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
	2010	2010	2010	2010	2010
			_		
BASE RATE REVENUES ** \$	32.36	32.36	32.36	32.36	32.36
FUEL RECOVERY FACTOR CENTS/KWH	11.93	11.93	11.93	11.93	11.93
GROUP LOSS MULTIPLIER	1.00000	1.00000	1.00000	1.00000	1.00000
FUEL RECOVERY REVENUES \$	119.27	119.27	119.27	119.27	119.27
GROSS RECEIPTS TAX	3.89	3.89	3.89	3.89	3.89
TOTAL REVENUES *** \$	155.52	155.52	155.52	155.52	155.52

	TOTAL
L	388.32
	1,431.24
	46.68
	1,866.24

PERIOD

* MONTHLY AND CUMULATIVE TWELVE MONTH ESTIMATED DATA

** BASE RATE REVENUES PER 1000 KWH:

CUSTOMER CHARGE 12.00
CENTS/KWH 19.58
CONSERVATION FACTOR 0.780

32.36

FLORIDA PUBLIC UTILITIES COMPANY

MC-4 REVISED

PAGE 5 OF 5

^{***} EXCLUDES FRANCHISE TAXES

BEFORE THE

FLORIDA PUBLIC SERVICE COMMISSION DOCKET NO. 090001-EI

CONTINUING SURVEILLANCE AND REVIEW OF FUEL COST RECOVERY CLAUSES OF ELECTRIC UTILITIES

Direct Testimony of Curtis Young and Mark Cutshaw On Behalf of Florida Public Utilities Company

Please state your name and business address.

2	A.	Curtis Young, 401 South Dixie Highway, West Palm Beach, FL 33401.
3	Q.	By whom are you employed?
4	A.	I am employed by Florida Public Utilities Company.
5	Q.	Have you previously testified in this Docket?
6	A.	Yes.
7	Q.	Please state your name and business address.
8	A.	Mark Cutshaw, 401 South Dixie Highway, West Palm Beach, FL 33401.
9	Q.	By whom are you employed?
10	A.	I am employed by Florida Public Utilities Company.
11	Q.	Have you previously testified in this Docket?
12	A.	Yes.
13	Q.	What is the purpose of your testimony at this time?
14	A.	I will briefly describe the basis for the computations that were
15		made in the preparation of the various Schedules that we have
16		submitted in support of the January 2010 - December 2010 fuel cost
17		recovery adjustments for our two electric divisions. In addition,
18		I will advise the Commission of the projected differences between
19		the revenues collected under the levelized fuel adjustment and the
20		purchased power costs allowed in developing the levelized fuel
21		adjustment for the period January 2009 - December 2009 and to
22		establish a "true-up" amount to be collected or refunded during
23		January 2010 - December 2010.
24	Q.	Were the schedules filed by your Company completed under your

DOCUMENT NUMBER-DATE

Rev. 10/09

1		direction or review?
2	A.	Yes.
3	Q.	Which of the Staff's set of schedules has your company completed
4		and filed?
5	A.	We have filed Schedules E1, E1A, E2, E7, and E10 for Marianna
6		(Northwest division) and E1, E1A, E2, E7, E8, and E10 for
7		Fernandina Beach (Northeast division). They are included in
8		Composite Prehearing Identification Number MC-4.
9	Q.	In derivation of the projected cost factor for the January 2010 -
10		December 2010 period, did you follow the same procedures that were
11		used in the prior period filings?
12	A.	Yes.
13	Q	Why has the GSLD1 rate class for Fernandina Beach (Northeast
14		division) been excluded from these computations?
15	A.	Demand and other purchased power costs are assigned to the GSLD1
16		rate class directly based on their actual CP KW and their actual
17		KWH consumption. That procedure for the GSLD1 class has been in
18		use for several years and has not been changed herein. Costs to be
19		recovered from all other classes are determined after deducting
20		from total purchased power costs those costs directly assigned to
21		GSLD1.
22	Q.	How will the demand cost recovery factors for the other rate
23		classes be used?
24	A.	The demand cost recovery factors for each of the RS, GS, GSD, GSLD,
25		GSLD1 and OL-SL rate classes will become one element of the total
26		cost recovery factor for those classes. All other costs of
27		purchased power will be recovered by the use of the levelized
28		factor that is the same for all those rate classes. Thus the total
29		factor for each class will be the sum of the respective demand cost

factor and the levelized factor for all other costs.

Q. Is there any additional calculation of cost that is included in these costs recovery factors?

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- A. Yes. Consistent with the prior year we introduced an allocation of a portion of the transmission cost to the NE FL customers was made.

 We are continuing to include that calculation in these cost recovery factors.
- Q. Why is it appropriate to allocate a portion of the transmission costs to the NE Florida customers?
- A. The distribution charge (associated with distribution substations in NW FL) within the fuel charge should be allocated to both divisions in order to offset the disparity in substation related plant cost in the two divisions. This will allow all customers to contribute to the distribution charge within fuel just as all customers contribute to the substation plant related cost included in the base rates. Our NW division pays for a portion of distribution substations via a distribution charge through the fuel clause, where similar costs in our NE division are paid through base rates since FPUC owns the related plant and it is included in rate base. In the NW Division, Gulf Power Company owns the distribution substation with the exception of the distribution feeder bus. To allow for fair recovery of these costs the fuel portion should be allocated between the two electric divisions, similar to the rate base portion included for recovery in base rates. This allows for equitable cost distribution and recovery between all of our customers.
- Q. What is the appropriate total cost allocated to the NE Florida customers for the 2010 calendar year?
- A. The appropriate total cost allocated to the NE Florida customers for the 2010 calendar year is \$476,832

1	Q.	What was the basis of the allocation used to allocate
2		a portion of the transmission costs to NE Florida
3		Customers?
4	A.	One half of the distribution charge will be included
5		within the NE FL fuel determination just as the substation plant
6		cost was equally allocated to all customers within base rates.
7	Q.	Please address the calculation of the total true-up amount to be
8		collected or refunded during the January 2010 - December 2010 years
9	A.	We have determined that at the end of December 2009 based on six
10		months actual and six months estimated. We will have under-
11		recovered \$1,725,320 in purchased power costs in our Marianna
12		(Northwest division). Based on estimated sales for the period
13		January 2010 - December 2010, it will be necessary to add .54258¢
14		per KWH to collect this under-recovery.
15		In Fernandina Beach (Northeast division) we will have under-
16		recovered \$825,258 in purchased power costs. This amount will be
17		collected at .24523¢ per KWH during the January 2010 - December
18		2010 period (excludes GSLD1 customers). Page 3 and 10 of Composite
19		Prehearing Identification Number MC-4 provides a detail of the
20		calculation of the true-up amounts.
21	Q.	What are the final remaining true-up amounts for the period January
22		2008 - December 2008 for both divisions?
23	A.	In Marianna (Northwest division) the final remaining true-up amount
24		was an over-recovery of \$591,984. The final remaining true-up
25		amount for Fernandina Beach (Northeast division) was an over

- Q. What are the estimated true-up amounts for the period of January 2009 December 2009?
- A. In Marianna (Northwest division), there is an estimated under-

recovery of \$1,659,809.

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recovery of \$2,317,304. Fernandina Beach (Northeast division) has
an estimated under-recovery of \$2,485,067.

- Q. What will the total fuel adjustment factor, excluding demand cost recovery, be for both divisions for the period?
- A. In Marianna (Northwest division) the total fuel adjustment factor is 8.197¢ per KWH. In Fernandina Beach (Northwest division) the total fuel adjustment factor for "other classes", as shown on Line 43, Schedule E1, amounts to 6.572¢ per KWH.
- Q. Please advise what a residential customer using 1,000 KWH will pay for the period January 2010 - December 2010 including base rates, conservation cost recovery factors, and fuel adjustment factor and after application of a line loss multiplier.
- A. In Marianna (Northwest division) a residential customer using 1,000 KWH will pay \$155.52, an increase of \$18.93 from the previous period. In Fernandina Beach (Northeast division) a customer will pay \$131.80 an increase of \$1.81 from the previous period.
- Q. Are there any relevant issues you would like to highlight regarding this calculation?
- A. Yes. On January 26, 2009, Smurfit-Stone Container Corporation filed for bankruptcy protection. Smurfit-Stone is a Florida Public Utilities Company customer in the Northeast Division and is billed under the General Service Large Demand 1 (GSLD1) rate. In order to capture the pre- and post-bankruptcy cost that resulted, two separate bills were generated based on the criteria set forth in the GSLD1 rate structure. Based on the demand components of the billing methodology, the sum of the two bills exceeded the fuel revenue amount that would have been billed if the bankruptcy had not occurred and only one bill was generated. The net amount of the GSLD1 excess fuel revenue adjustment is \$100,076 (Exhibit 1 of

Florida Public Utilities Company's Petition for Approval of Fuel

Adjustment and Purchased Power Cost Recovery True-Up Amount filed

August 4, 2009 details this calculation).

- Q. What effect, if any, has this adjustment had on the fuel cost recoveries of the other remaining customer classes.
- A. None. The fuel costs allocated to the remaining customer classes and all over and under recoveries for these customers are appropriate and would be the same if the bankruptcy did not occur.
- Q. What is the appropriate treatment for the GSLD1 fuel billing adjustment?
- A. Since this adjustment is specific to one GSLD1 Customer and the tariff and fuel clause requires direct pass-through of fuel costs to this type of customer, no over or under recoveries should exist. It would be appropriate to apply the excess fuel revenue billed to this specific GSLD1 customer against the portion of their bankruptcy-related bad debt write-off that is related to fuel revenues. The net result of this adjustment would be a reduction to GSLD1 fuel revenue of \$100,148 (Exhibit 1 of Florida Public Utilities Company's Petition for Approval of Fuel Adjustment and Purchased Power Cost Recovery True-Up Amount filed August 4, 2009 details this calculation) and a reduction of the GSLD1 Accounts Receivable (pre-bankruptcy bad debt write-off) on the fuel revenue portion only.
- Q. Why did the midcourse correction for the Northeast Florida division occur in April 2009 when the increase in rates from JEA did not increase until May?
- A. FPUC was notified by JEA in January 2009 that certain factors in the purchased power rate would increase in March 2009. Due to the purchased power rate increase, FPU began negotiations with JEA on

the proposed increases and filed for a mid-course correction effective beginning with usage in March 2009. Negotiations and review of rates continued with JEA which resulted in the implementation of the purchased power rate increase being delayed until April 2009 which led to an amendment of the petition and delayed the mid-course correction effective beginning with usage in April 2009. Negotiations continued between JEA and FPUC without ever reaching an agreement regarding amounts to be included in the purchased power rates. On April 21, 2009, FPUC made a presentation to the JEA Board of Directors objecting to the proposed rates and provided alternative rates along with the justification for accepting the alternative rates. In this meeting the JEA Board of Directors rejected the alternative rates proposed by FPUC and approved rates proposed by JEA which were to be effective May 1, 2009. Although the mid-course correction did go into effective prior to the final rate being effective from JEA, the negotiations were successful in delaying implementation of the rate increase for two months and the factors initially proposed were reduced thus reducing the impact on FPUC customers.

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- Q. Why is the increase in rates for NW FL more than those seen in NE FL?
- A. During January 2009, Southern Company notified FPUC of additional increases in the purchased power rates. After reviewing the increased amounts, it was determined that a mid-course correction would not be required for 2009 since the underrecovery amount would be less than 10%. However, although it was known that an under recovery would occur in 2009, estimates of the increases proposed in 2010 were grossly under estimated. The significant increases by Gulf Power in 2010, coupled with the under recovery for 2009

- resulted in significant increase to the FPUC customer in Northwest

 Florida.
 - Q. What is FPUC doing to mitigate these increases?
 - A. FPUC is continuing discussions with Southern Company to determine if reductions in proposed rates are possible. All options are being explored and will continue until all possible remedies are exhausted.
 - Q. Are other possible options being considered to minimize the impact on customers?
 - A. Yes.

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- Q. What are those options?
- The most realistic option to reduce the impact on the Northwest Florida customers is to remove the 2009 under recovery amount of \$1,725,320 and to recover this amount separately over amortize this amount of a certain period of time through the use of a portion of the storm hardening revenues received in our recent base rate increase. We would reduce a portion of the storm hardening expenditures and use those revenues for recovery of the underrecovered fuel costs. For 2010, the contribution to the amortization would occur by reducing the storm hardening expenditures in the Northwest Florida area in amount of approximately \$295,500. The total fuel adjustment factor as shown on Line 33, Schedule E1 would then be 7.654¢ and a residential customer using 1,000 KWH would pay a typical bill of \$149.95, reducing the increase resulting from the 2009 under recovery by a total of \$5.63. This option is being proposed for only a one year period and depending on future fuel costs, we would evaluate each year to determine if we should continue with the storm hardening reductions to amortize any remaining underrecovery, or roll back

l into the fuel clause and recover through fuel rates.

- Q. Are there other options?
- A. We are continuing negotiations with Southern Company on fuel costs but are unable to determine if any changes will occur for 2010.

 These negotiations will review in detail all aspects of the rate components in order to ensure all components of the purchase power agreement are appropriate and the make any corrections that are necessary. All remedies are being explored as we continue these discussions.
- Q. Does this conclude your testimony?
- A. Yes.

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