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September 1, 2015

BY ELECTRONIC FILING

Ms. Carlotta Stauffer, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 150001-EI: Fuel and Purchased Power Cost Recovery Clause with Generating Performance Incentive Factor

Dear Ms. Stauffer:

Attached for electronic filing, please find the Petition for Approval of Fuel Adjustment and Purchased Power Cost Recovery Factors submitted on behalf of Florida Public Utilities Company, along with the Direct Testimony and Exhibit CDY-3 (redacted) of Mr. Curtis Young and the direct testimony of P. Mark Cutshaw on behalf of the Company. Portions of Mr. Young's Exhibit CDY-3 are submitted under separate cover along with a Request for Confidential Classification and Motion for Temporary Protective Order.

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,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

MEK

cc:/(Certificate of Service)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery | DOCKET NO. 150001-EI clause with generating performance incentive

factor.

DATED: September 1, 2015

FLORIDA PUBLIC UTILITIES COMPANY'S PETITION FOR APPROVAL OF FUEL ADJUSTMENT AND PURCHASED POWER **COST RECOVERY FACTORS**

Florida Public Utilities Company (FPUC or Company), by and through its undersigned counsel, hereby files this Petition asking the Florida Public Service Commission (FPSC or Commission) for approval of FPUC's fuel adjustment and purchased power cost recovery factors for the period January 2016 through December 2016. In support of this request, the Company hereby states:

1) FPUC is an electric utility subject to the Commission's jurisdiction. Its principal business address is:

> Florida Public Utilities Company 1750 S 14th Street, Suite 200 Fernandina Beach FL 32034

2) The name and mailing address of the persons authorized to receive notices are:

Beth Keating, Esq. Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, Florida 32301-1839 (850) 521-1706

Mike Cassel Director, Regulatory and Governmental Affairs Florida Public Utilities Company 1750 S 14th Street, Suite 200 Fernandina Beach FL 32034 mcassel@fpuc.com

Consistent with the requirements for this proceeding, the Company has prefiled 3) the fuel adjustment and purchased power cost recovery schedules supplied by the Commission consistent with the requirements for such filings, and have reflected therein the Company's calculated fuel adjustment factors.

- 4) In accordance with Order PSC-15-0096-PCO-EI, issued February 10, 2015, in this Docket, the Company is also submitting, contemporaneously with this Petition, the Direct Testimony Mr. Curtis D. Young and the Direct Testimony of Mr. Mark Cutshaw, along with Exhibit CDY-3, in support of the Company's request for approval of the requested factors. FPUC notes that, consistent with the Commission's approval allowing the Company to consolidate the fuel factors for its Northeast and Northwest Divisions, the schedules included in Exhibit CDY-3 reflect that consolidation.¹
- 5) The testimonies of the Company's witnesses also address the Company's ongoing initiatives to mitigate fuel costs through arrangements with alternative energy providers, as well as possible new projects. The Company is aggressively pursuing one project in particular which would involve a new interconnection with FPL in the Company's Northeast Division. As explained by witness Cutshaw, this project will result in the Company being better situated in terms of negotiating a new power purchase agreement for the Northeast Division to follow the current agreement, which terminates at the end of 2017. The costs, as well as the projected savings (for which the Company is seeking confidential classification) associated with that project, are addressed in the testimony of Mr. Young.
- 6) In addition, consistent with past requests of the Company, the Company seeks to recover certain legal and consulting costs associated with fuel and purchased power projects designed to reduce fuel and purchased costs for FPUC's customers, which have not otherwise been included for recovery in base rates. These costs are consistent with Commission policy set forth in Order No. 14546, as well as Commission decisions allowing the Company to recover

¹ See Order No. PSC-14-0701-FOF-EI, issued December 19, 2014, in Docket No. 140001-EI, at page 6.

such costs in Order No. PSC-05-1252-FOF-EI, issued in Docket No. 050001-EI, as well as similar such decisions in Dockets No. 120001-EI and 130001-EI.

- As set forth in the Testimony and Exhibit CDY-3 of Witness Young, the Company's total true-up amounts that would be collected or refunded during the period January 2016 through December 2016 is an under-recovery of \$1,588,726 for the Consolidated Electric Division, reflecting an estimated consolidated under-recovery of \$112,373 for 2015. Based on estimated sales for January 2016 through December 2016 of 631,322,285 kwhs, an additional .25165¢ per kWh will need to be collected to address this under-recovery.
- 8) Based upon the Company's projections and the total true-up amounts to be collected for both Divisions, the appropriate levelized fuel adjustment and purchased power cost recovery factors for the period January 2016 through December 2016, excluding demand cost recovery and adjusted for line loss multipliers and including taxes, are as follows:

Rate Schedule

Adjustment

RS	\$0.10620
GS	\$0.10170
GSD	
	\$0.09710
GSLD	\$0.09408
LS	\$0.07212
Step rate for RS	\$0.07212
RS Sales	
	\$0.10620
RS with less than 1,000 kWh/month	
	\$0.10189
RS with more than 1,000 kWh/month	
,	\$0.11439

- 9) For the Consolidated Electric Division, the total fuel adjustment factor is 6.693¢ per kWh for "other classes." Thus, a customer in either Division using 1,000 kWh will pay \$140.06, a decrease of \$1.04 from the prior period.
- 10) The Company has also adjusted the Time of Use (TOU) and Interruptible rates for the 2016 period. The Company submits that the methodology used to compute the rates reflected below is consistent with the methodology previously approved by the Commission.

Time of Use/Interruptible

Rate Schedule	Adjustment On Peak	Adjustment Off Peak
RS		
	\$0.18589	\$0.06289
GS		
	\$0.14170	\$0.05170
GSD		
	\$0.13710	\$0.06460
GSLD		
	\$0.15408	\$0.06408
Interruptible		
	\$0.07908	\$0.09408

11) The Company attests that these factors have been calculated correctly and consistent with Commission requirements. Thus, the Company asks that the Commission approve the proposed factors as set forth herein.

WHEREFORE, FPUC respectfully requests that the Commission approve the Company's proposed fuel adjustment and purchased power cost recovery factors for January 2016 through December 2016.

RESPECTFULLY SUBMITTED this 1st day of September, 2015.

Beth Keating /

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

Attorneys for Florida Public Utilities Company

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with electronic copies of the Direct Testimony of Curtis Young and redacted Exhibit CDY-3, as well as the Direct Testimony of P. Mark Cutshaw, have been furnished by Electronic Mail to the following parties of record this 1st day of September, 2015:

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Martha Barrera	Daniels
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By:

Beth Keating

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Tallahassee, FL 32301

(850) 521-1706

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 150001-EI: FUEL AND PURCHASED POWER COST RECOVERY CLAUSE WITH GENERATING PERFORMANCE INCENTIVE FACTOR

2016 Projection Testimony of Curtis D. Young On Behalf of Florida Public Utilities Company

1	Q.	Please state your name and business address.
2	A.	Curtis D. Young, 1641 Worthington Road Suite 220, West Palm
3		Beach, FL 33409.
4	Q.	By whom are you employed?
5	A.	I am employed by Florida Public Utilities Company (FPUC).
6	Q.	Could you give a brief description of your background and
7		business experience?
8	A.	I am the Senior Regulatory Analyst. I have performed various
9		accounting and analytical functions including regulatory filings,
10		revenue reporting, account analysis, recovery rate
11		reconciliations and earnings surveillance. I'm also involved in the
12		preparation of special reports and schedules used internally by
13		division managers for decision making projects. Additionally, I
14		coordinate the gathering of data for the FPSC audits.
15	Q.	Have you previously testified in this Docket?
16	A.	Yes.
17	Q.	What is the purpose of your testimony at this time?
18	A.	I will briefly describe the basis for the computations that were

1	made in the preparation of the various Schedules that th
2	Company has submitted in support of the January 2016
3	December 2016 fuel cost recovery adjustments for it
4	consolidated electric divisions. In addition, I will explain the
5	projected differences between the revenues collected under the
6	levelized fuel adjustment and the purchased power cost
7	allowed in developing the levelized fuel adjustment for the period
8	January 2015 – December 2015 and to establish a "true-up
9	amount to be collected or refunded during January 2016
10	December 2016.
11	Consolidated Electric Cost Recovery Schedules

- Consolidated Electric Cost Recovery Schedules
- 12 Q. Were the schedules filed by the Company completed by you?
- Α. Yes, they were completed by me under the supervision and 13 review of Mr. Cutshaw. 14
- 15 Q. Which of the Staff's set of schedules has your company completed and filed for approval in this Docket? 16
- A. The Company has filed Consolidated Electric Schedules E1, 17 18 E1A, E2, E7, E8, E10 and Attachment A. Composite Exhibit Number CDY-3 contains this information. 19
- Q. Did you follow the same procedures that were used in the prior 20 21 period filing in preparing the projected cost factors for January -December 2016 for the Consolidated Electric Divisions? 22

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l	A.	Yes. In the prior period, the Company requested and
2		subsequently received approval to consolidate the fuel filing of
3		its two electric divisions. This fuel rate consolidation allowed
1		FPUC to standardize fuel costs, as is done by other utilities, and
5		assisted in stabilizing fuel rate charges to all customers now and
5		in the future.

- II. Additional Fuel-Related Costs Included for Recovery
- Q. Did you include costs in addition to the costs specific to purchased fuel in the calculations of your true-up and projected amounts?
- A. Yes, included with our fuel and purchased power costs are charges for contracted consultants and legal services that are directly fuel-related and appropriate for recovery in the fuel clause.
- 15 Q. Please explain how these costs were determined to be 16 recoverable under the fuel clause?
- A. Consistent with the Commission's policy set forth in Order No.

 18 14546, issued in Docket No. 850001-EI-B, on July 8, 1985, the

 19 other costs included in the fuel clause are directly related to fuel,

 20 have not been recovered through base rates.

1	Specifically, consistent with item 10 of Order 14546, the costs
2	the Company has included are fuel-related costs that were not
3	anticipated or included in the cost levels used to establish the
4	current base rates. To be clear, these costs are not tied to the
5	Company's internal staff involvement in fuel and purchased
6	power procurement and administration. Instead, these costs are
7	associated with external contracts which consequently, tend to
8	be more volatile depending upon the issue. Similar expenses
9	paid to Christensen and Associates associated with the design
10	for a Request for Proposals of Fuel costs, and the evaluation of
11	those responses, were deemed appropriate for recovery by
12	FPUC through the fuel clause in Order No. PSC-05-1252-FOF-
13	EI, Item II E, issued in Docket No. 050001-EI. Additionally, in
14	more recent Docket Nos. 120001-EI, 130001-EI, 140001-EI and
15	150001-EI, the Commission determined that many of the costs
16	associated with the legal and consulting work incurred by the
17	Company as fuel related, particularly those costs related to the
18	purchase power agreement review and analysis, were
19	recoverable under the fuel clause. Likewise, the Company
20	believes that the costs addressed herein are appropriate for
21	recovery through the fuel clause.

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Q. Please explain what are the costs outside of purchased fuel costs included in the 2015 true-up for Florida Public Utilities Company?

Florida Public Utilities engaged Gunster, Yoakley & Stewart, P.A. ("Gunster"), Christensen and Associates ("Christensen") and Pierpont and McClelland ("Pierpont") for assistance in the development and enactment of projects/programs designed to reduce their fuel rates to its customers. The Company will continue to engage legal and consulting assistance as it explores additional fuel related savings options including other CHP opportunities and solar/photovoltaic opportunities. The legal and consulting costs associated with the development and negotiations of the power supply contracts (JEA) are appropriate for recovery through the Fuel and Purchased Power cost recovery clause. Christensen and Pierpont have been performing due diligence in their occasional review and analysis of the terms of the current Renewable Energy Agreement between FPUC and Rayonier in order to increase the production of renewable energy and for further discovering avenues towards negotiating cost reductions. These costs were not included in expenses during the last FPUC consolidated electric

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base rate proceeding and are not being recovered through base		
rates. Christensen and Pierpont have been performing due		
diligence in their occasional review and analysis of the terms of		
the current Purchased Power Agreement between FPUC and		
JEA in the efforts of further discovering avenues towards		
minimizing cost increases and/or negotiating cost reductions.		
The resulting savings from their efforts have been included in		
the 2013, 2014 and 2015 True-up as well as our 2016		
Projections. The associated legal and consulting costs, included		
in the rate calculation of the Company's 2016 Projection factors,		
were not included in expenses during the last FPUC		
consolidated electric base rate proceeding and are not being		
recovered through base rates.		
Are there any other fuel related costs included in this filing?		

Q.

Yes, the Company has included depreciation expense, taxes other than income taxes and a return on investment for an FPL interconnect to its Northeast Division. These costs will directly result in fuel savings to our customers, and will increase the reliability of electricity to the Northeast Division. These costs have not been recovered through base rates, and will directly benefit the customers through future reductions to its fuel costs.

1	Since this investment would allow the Company to pursue
2	alternatives in its future fuel contracts, and will result in
3	additional fuel options as well as increased competition to
4	provide fuel to our Company, the Company feels that recovery in
5	the fuel clause would be appropriate until such time that any
6	remaining costs, if any, can be rolled into rate base in a future
7	rate proceeding. See Exhibit Schedule A for a summary of the
8	expected costs for the interconnect investment, and the related
9	revenue requirement that is included in this fuel filing for
10	recovery through fuel rates. Also included on this exhibit are
11	estimated savings that will likely occur as a result of this
12	investment to our customers. Without recovery on this
13	investment as requested, the Company would either have to
14	defer this project and the anticipated benefits, or would have to
15	file a rate proceeding to pursue recovery through base rates,
16	which would inevitably be a lengthy and costly process.
17	Ultimately, the Company believes that this project with be
18	economically beneficial to its rate payers and will facilitate the
19	Company's efforts to achieve fuel savings for its customers. As
20	such, the Company believes that recovery is consistent with prior
21	cases in which recovery of similar, fuel-related investments has

1		been allowed, because it will lower the delivered price of fuel –
2		or input price - for FPUC, as contemplated by Order No. 14546
3		and Order No. PSC-95-1089-FOF-EI. Moreover, it will avoid
4		"regulatory lag", which the Commission has recognized in the
5		past as the underlying purpose for the Fuel Clause.
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9		Summary Rates
10	Q.	What are the final remaining true-up amounts for the period
11		January – December 2014 for both Divisions?
12	A.	The final remaining consolidated true-up amount was an under-
13		recovery of \$1,476,353.
14	Q.	What are the estimated true-up amounts for the period of
15		January – December 2015?
16	A.	There is an estimated consolidated under-recovery of \$112,373.
17	Q.	Please address the calculation of the total true-up amount to be
18		collected or refunded during the January - December 2016 year?
19	A.	The Company has determined that at the end of December
20		2015, based on six months actual and six months estimated, we
21		will have a consolidated electric under-recovery of \$1,588,726.

1	Q.	What will the total consolidated fuel adjustment factor, excluding
2		demand cost recovery, be for the consolidated electric division
3		for the period?
4	A.	The total fuel adjustment factor as shown on line 43, Schedule
5		E-1 is 6.693¢ per KWH.
6	Q.	Please advise what a residential customer using 1,000 KWH will
7		pay for the period January - December 2016 including base
8		rates, conservation cost recovery factors, gross receipts tax and
9		fuel adjustment factor and after application of a line loss
10		multiplier.
11	A.	As shown on consolidated Schedule E-10 in Composite Exhibit
12		Number CDY-3, a residential customer using 1,000 KWH will
13		pay \$140.06. This is a decrease of \$1.04 under the previous
14		period.
15	Q.	Does this conclude your testimony?
16	A.	Yes.

EXHIBIT NO.____(CDY-1)

TO THE

DIRECT TESTIMONY OF CURTIS D. YOUNG

ON BEHALF OF

FLORIDA PUBLIC UTILITIES COMPANY (REDACTED)

FLORIDA PUBLIC UTILITIES COMPANY

FUEL AND PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

FLORIE	DA DIVISION-CONSOLIDATED	(a) DOLLARS	(b) MWH	(c) CENTS/KWH
1	Fuel Cost of System Net Generation (E3)			
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	0.00000
6	Fuel Cost of Purchased Power (Exclusive of Economy) (E7)	29,415,207	572,000	5.14252
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 & Non Fuel Cost of Purch Power (E2)	36,583,802	572,000	6.39577
10a	Demand Costs of Purchased Power	24,991,075	*	
10b	Non-fuel Energy & Customer Costs of Purchased Power	11,592,727	*	
11	Energy Payments to Qualifying Facilities (E8a)	1,489,988	111,155	1.34046
12	TOTAL COST OF PURCHASED POWER (LINE 6 THRU 11)	67,488,997	683,155	9.87902
13	TOTAL AVAILABLE KWH (LINE 5 + LINE 12)	67,488,997	683,155	9.87902
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	67,488,997	683,155	9.87902
	(LINE 5 + 12 + 18 + 19)			
21	Net Unbilled Sales	0	* 0	0.00000
22	Company Use	65,597	* 664	0.00995
23	T & D Losses	2,313,271	*23,416_	0.35099
24	SYSTEM MWH SALES	67,488,997	659,075	10.23996
25	Wholesale MWH Sales			
26	Jurisdictional MWH Sales	67,488,997	659,075	10.23996
26a	Jurisdictional Loss Multiplier	1.00000	1.00000	
27	Jurisdictional MWH Sales Adjusted for Line Losses	67,488,997	659,075	10.23996
27a	GSLD1 MWH Sales		27,754	
27b	Other Classes MWH Sales		631,321	
27c	GSLD1 CP KW		552,000 *	
28	Projected Unbilled Revenues	(100,000)	631,321	-0.01584
29	GPIF **			
30	TRUE-UP (OVER) UNDER RECOVERY **	1,588,726		0.25165
31	TOTAL JURISDICTIONAL FUEL COST	68,977,723		10.92594
31a	Demand Purchased Power Costs (Line 10a)	24,991,075		
31b	Non-demand Purchased Power Costs (Lines 6 + 10b + 11)	42,497,922		
31c	True up Over/Under Recovery (Line 29)	1,588,726		
31d	Unbilled Revenues	(100,000))	
	* For Informational Purposes Only			
	** Calculation Based on Jurisdictional KWH Sales		EXHIBIT NO	
			DOCKET NO. 15000	
			FLORIDA PUBLIC UT	ILITIES COMPANY

(CDY-3) PAGE 1 OF 10

FLORIDA PUBLIC UTILITIES COMPANY

FUEL AND PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

<u>FLORI</u>	DRIDA DIVISION-CONSOLIDATED	(a)	(b)		(c)		
		DOLLARS	MWH		CENTS/KWH		
AF	PPORTIONMENT OF DEMAND COSTS						
31	Total Demand Costs (Line 30a)	24,991,075					
32	GSLD1 Portion of Demand Costs (Line 30a) Including Line Losses(Line 27c x \$2.96)	3,231,648	552,000	(KW)	\$5.85	/KW	
33	Balance to Other Classes	21,759,427	631,321		3.44665	-	
AF	PPORTIONMENT OF NON-DEMAND COSTS						
34	Total Non-demand Costs(Line 30b)	42,497,922					
35	Total KWH Purchased (Line 12)	, ,	683,155	KWH			
36	Average Cost per KWH Purchased				6.22083		
37	Average Cost Adjusted for Line Losses (Line 36 x 1.03)				6.40745		
38	GSLD1 Non-demand Costs (Line 27a x Line 37)	1,759,879	27,754		6.34099	_	
39	Balance to Other Classes	40,738,044	631,321		6.45283	-	
GS	SLD1 PURCHASED POWER COST RECOVERY FACTORS						
40a	Total GSLD1 Demand Costs (Line 32)	3,231,648	552,000	(KW)	\$5.85	/KW	
40b	Revenue Tax Factor			, ,	1.00072		
40c	GSLD1 Demand Purchased Power Factor Adjusted for Taxes & Rounded				\$5.85	/KW	
40d	Total Current GSLD1 Non-demand Costs(Line 38)	1,759,879	27,754		6.34099		
40e	Total Non-demand Costs Including True-up	1,759,879	27,754		6.34099	-	
40f	Revenue Tax Factor				1.00072		
40g	GSLD1 Non-demand Costs Adjusted for Taxes & Rounded				6.34556		
	THER CLASSES PURCHASED POWER COST RECOVERY						
41a	Total Demand & Non-demand Purchased Power Costs of Other Classes(Line 33 + 39)	62,497,470	631,321		9.89948		
41b	Less: Total Demand Cost Recovery	21,759,427 ***					
41c	Total Other Costs to be Recovered	40,738,044	631,321		6.45283		
41d	Unbilled Revenue	(100,000)	631,321		-0.01584		
41e	Other Classes' Portion of True-up (Line 30c)	1,588,726	631,321		0.25165		
41f	Total Demand & Non-demand Costs Including True-up	42,226,769	631,321		6.68864	-	
42	Revenue Tax Factor	, ,	•		1.00072		
43	Other Classes Purchased Power Factor Adjusted for Taxes & Rounded	42,257,172			6.693		

^{*} For Informational Purposes Only

EXHIBIT NO. _____ DOCKET NO. 150001-EI

FLORIDA PUBLIC UTILITIES COMPANY

(CDY-3) PAGE 2 OF 10

^{**} Calculation Based on Jurisdictional KWH Sales
*** Calculation on Schedule E1 Page 3

FLORIDA PUBLIC UTILITIES COMPANY
FUEL AND PURCHASED POWER
COST RECOVERY CLAUSE CALCULATION

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

FLORIDA DIVISION-CONSOLIDATED

		(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
			(1)/((2)*8,760)			(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
44	RS	317,538,439	57.025%	63,566.3	1.089	1.030	69,223.7	327,064,592	57.84%	50.29%
45	GS	63,005,986	65.083%	11,051.2	1.089	1.030	12,034.8	64,896,166	10.06%	9.98%
46	GSD	156,696,394	75.900%	23,567.5	1.089	1.030	25,665.0	161,397,286	21.45%	24.82%
47	GSLD	86,533,538	85,182%	11,596.6	1.089	1.030	12,628.7	89,129,544	10.55%	13.71%
48	LS	7,547,928	782,723%	110.1	1.089	1.030	119.9	7,774,366	0.10%	1.20%
49		0	782.723%	0.0	1.089	1.030	0.0	0	0.00%	0.00%
	TOTAL	631,322,285		109,891.7			119,672.1	650,261,954	100.00%	100.00%

		(10) 12/13 * (8)	(11) 1/13 * (9)	(12) (10) + (11) Demand	(13) Tot. Col. 13 * (9)	(14) (13)/(1)	(15) (14) * 1.00072 Demand Cost	(16)	(17) (15) + (16)
	Rate Schedule	12/13 Of 12 CP	1/13 Of Energy	Allocation Percentage	Demand Dollars	Demand Cost Recovery	Recovery Adj for Taxes	Other Charges	Levelized Adjustment
50	RS	53,39%	3.87%	57.26%	\$12,459,448	0.03924	0.03927	0.06693	0.10620
51	GS	9.29%	0.77%	10.06%	2,188,998	0.03474	0.03477	0.06693	0.10170
52	GSD	19.80%	1.91%	21.71%	4,723,972	0.03015	0.03017	0.06693	0.09710
53	GSLD	9.74%	1.05%	10.79%	2,347,842	0.02713	0.02715	0.06693	0.09408
54	LS	0.09%	0.09%	0.18%	39,167	0.00519	0.00519	0.06693	0.07212
	TOTAL	92.31%	7 69%	100.00%	\$21 759 427				

Step Rate Allocation for Residential Customers

(18) (19) (20) (21) (19) * (20)

	Rate				(10) (20)
	Schedule	Allocation	Annual kWh	Levelized Adj.	Revenues
56	RS	Sales	317,538,439	\$0.10620	\$33,722,582
57	RS	<= 1,000kWh/mo.	208,080,457	\$0,10189	\$21,201,558
58	RS:	> 1,000 kWh/mo.	109,457,982	\$0.11439	\$12,521,025
59	RS	Total Sales	317,538,439		\$33,722,582

(2) From Gulf Power 2012 Load Research results.

TOU Rates

	100 Nates				
		(22)	(23)	(24)	(25)
		On Peak	Off Peak		
	Rate	Rate	Rate	Levelized Adj.	Levelized Adj.
	Schedule	Differential	Differential	On Peak	Off Peak
60	RS	0.0840	(0.0390)	\$0.18589	\$0.06289
61	GS	0.0400	(0.0500)	\$0.14170	\$0.05170
62	GSD	0.0400	(0.0325)	\$0.13710	\$0.06460
63	GSLD	0.0600	(0.0300)	\$0.15408	\$0.06408
64	Interruptible	(0.0150)	-	\$0.07908	\$0.09408

FLORIDA PUBLIC UTILITIES COMPANY

CALCULATION OF TRUE-UP SURCHARGE
APPLICABLE TO LEVELIZED FUEL ADJUSTMENT PERIOD
JANUARY 2016 - DECEMBER 2016
BASED ON SIX MONTHS ACTUAL AND SIX MONTHS ESTIMATED OPERATIONS

FLORIDA DIVISION-CONSOLIDATED

Under-recovery of purchased power costs for the period January 2015 - December 2015. (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 2015.)(Estimated)	\$ 1,588,726
Portion of 2015 Under-recovery to be collected for the period January 2016 - December 2016	\$ 1,588,726
Estimated kilowatt hour sales for the months of January 2016 - December 2016 as per estimate filed with the Commission. (Excludes GSLD1 customers)	631,322,285
Cents per kilowatt hour necessary to collect under-recovered	

purchased power costs over the period January 2015 - December 2015

0.25165

FLORIDA PUBLIC UTILITIES COMPANY FLORIDA DIVISION-CONSOLIDATED

FUEL & PURCHASED POWER COST RECOVERY CLAUSE CALCULATION

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

			(a)	(b)	(c)	(d)	(e)	(f) ESTIMAT	(h) FED	(i)	(j)	(k)	(1)	(m)	(n)	
LINE NO.		J	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL PERIOD	NO.
1 1a	FUEL COST OF SYSTEM GENERATION NUCLEAR FUEL DISPOSAL														0	1 1a
2	FUEL COST OF POWER SOLD				~										0	2
3	FUEL COST OF PURCHASED POWER	3	3,088,134	2,503,635	2,611,066	2,101,601	2,795,318	3,130,514	2,793,093	2,638,836	2,527,614	1,883,251	1,636,126	1,706,018	29,415,207	3
3a	DEMAND & NON FUEL COST OF PUR POWER		3,045,465	2,631,847	2,753,907	2,292,243	2,772,688	2,613,107	3,622,381	3,579,880	3,444,736	3,270,764	3,341,820	3,214,965	36,583,802	3a
3b	QUALIFYING FACILITIES		104,823	133,837	133,837	104,823	133,837	133,837	104,823	133,837	133,837	104,823	133,837	133,837	1,489,988	3b
4	ENERGY COST OF ECONOMY PURCHASES	_													0	4
5	TOTAL FUEL & NET POWER TRANSACTIONS	6	6,238,423	5,269,319	5,498,810	4,498,667	5,701,843	5,877,458	6,520,297	6,352,553	6,106,187	5,258,838	5,111,783	5,054,820	67,488,997	5
5a	(SUM OF LINES A-1 THRU A-4) LESS: TOTAL DEMAND COST RECOVERY		2,312,880	1,928,312	2,034,104	1,638,674	2,037,779	1,844,500	1,791,154	1,811,316	1,633,178	1,533,574	1,676,674	1,517,283	21,759,427	5a
5b	TOTAL OTHER COST TO BE RECOVERED	;	3,925,542	3,341,007	3,464,706	2,859,993	3,664,064	4,032,958	4,729,143	4,541,237	4,473,009	3,725,264	3,435,109	3,537,537	45,729,570	5b
6	APPORTIONMENT TO GSLD1 CLASS		393,300	449,455	502,494	344,203	395,583	350,679	467,236	430,977	374,687	413,510	482,119	387,283	4,991,527	6
6a	BALANCE TO OTHER CLASSES	;	3,532,243	2,891,552	2,962,212	2,515,790	3,268,482	3,682,279	4,261,907	4,110,260	4,098,321	3,311,754	2,952,990	3,150,253	40,738,044	6a
6b	SYSTEM KWH SOLD (MWH)		56,540	56,789	51,125	43,852	48,397	56,706	68,382	64,587	64,504	51,224	46,213	50,756	659,075	6b
7	GSLD1 MWH SOLD		2,210	3,157	4,087	1,340	2,213	1,427	2,942	2,313	1,537	2,058	2,850	1,620	27,754	7
7 a	BALANCE MWH SOLD OTHER CLASSES		54,330	53,632	47,038	42,512	46,184	55,279	65,440	62,274	62,967	49,166	43,363	49,136	631,321	7a
7b	COST PER KWH SOLD (CENTS/KWH) APPLICABLE TO OTHER CLASSES		6.50146	5.39147	6.29749	5.91783	7.07709	6.66126	6.51269	6.60028	6.50868	6.73586	6.80993	6.41129	6.45283	7b
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)		6.50146	5.39147	6.29749	5.91783	7.07709	6.66126	6.51269	6.60028	6.50868	6.73586	6.80993	6.41129	6.45283	9
10	PROJECTED UNBILLED REVENUES(CENTS/KWH)		(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	(0.0158)	10
11	GPIF (CENTS/KWH)															11
12	TRUE-UP (CENTS/KWH) 1,5	588,726	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	0.25165	12
13	TOTAL		6.73727	5.62728	6.53330	6.15364	7.31290	6.89707	6.74850	6.83609	6.74449	6.97167	7.04574	6.64710	6.68864	13
14	REVENUE TAX FACTOR	0.00072	0.00485	0.00405	0.00470	0.00443	0.00527	0.00497	0.00486	0.00492	0.00486	0.00502	0.00507	0.00479	0.00482	14
15	RECOVERY FACTOR ADJUSTED FOR TAXES		6.74212	5.63133	6.53800	6.15807	7.31817	6.90204	6.75336	6.84101	6.74935	6.97669	7.05081	6.65189	6.69346	15
16	RECOVERY FACTOR ROUNDED TO NEAREST .001 CENT/KWH		6.742	5.631	6.538	6.158	7.318	6.902	6.753	6.841	6.749	6.977	7.051	6.652	6.693	16

EXHIBIT NO. ____ DOCKET NO. 150001-EI FLORIDA PUBLIC UTILITIES COMPANY (CDY-3) PAGE 5 OF 10

FLORIDA PUBLIC UTILITIES COMPANY FLORIDA DIVISION-CONSOLIDATED

PURCHASED POWER (EXCLUSIVE OF ECONOMY ENERGY PURCHASES)

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

(1)	(2)	(3)	(4)	(5)	(6)	(7)		(8)	(9)
MONTH	PURCHASED FROM	TYPE & SCHEDULE	TOTAL KWH PURCHASED	KWH FOR OTHER UTILITIES	KWH FOR INTERRUPTIBLE	KWH FOR FIRM	CENTS/KWH (A) FUEL COST	(B) TOTAL COST	TOTAL \$ FOR FUEL ADJ. (7) × (8) (A)
JANUARY 2016 FEBRUARY 2016 MARCH 2016 APRIL 2016 JUNE 2016 JULY 2016 AUGUST 2016 SEPTEMBER 2016 OCTOBER 2016 NOVEMBER 2016 DECEMBER 2016	JEA/GULF	MS MS MS MS MS MS MS MS MS MS	60,500,000 49,800,000 52,000,000 41,800,000 55,500,000 62,000,000 53,700,000 49,700,000 48,700,000 36,000,000 30,200,000 32,100,000			60,500,000 49,800,000 52,000,000 41,800,000 55,500,000 62,000,000 49,700,000 48,700,000 30,200,000 32,100,000	5.104354 5.027380 5.027280 5.027754 5.036610 5.049216 5.201291 5.309529 5.190172 5.231254 5.417637 5.314697	10.138181 10.312214 10.317255 10.511589 10.032443 9.263904 11.946879 12.512507 12.263552 14.316709 16.483266 15.330165	3,088,134 2,503,635 2,611,066 2,101,601 2,795,318 3,130,514 2,793,093 2,638,836 2,527,614 1,883,251 1,636,126 1,706,018
TOTAL			572,000,000	0	0	572,000,000	5.142519	11.538288	29,415,207

FLORIDA PUBLIC UTILITIES COMPANY FLORIDA DIVISION-CONSOLIDATED

PURCHASED POWER ENERGY PAYMENT TO QUALIFYING FACILITIES

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
MONTH	PURCHASED FROM	TYPE & SCHEDULE	TOTAL KWH PURCHASED	KWH FOR OTHER UTILITIES	KWH FOR INTERRUPTIBLE	KWH FOR FIRM	(A) FUEL COST	(B) TOTAL COST	TOTAL \$ FOR FUEL ADJ. (7) x (8) (A)
JANUARY 2016 FEBRUARY 2016 MARCH 2016 APRIL 2016 MAY 2016 JUNE 2016 JULY 2016 AUGUST 2016 SEPTEMBER 2016 OCTOBER 2016 NOVEMBER 2016 DECEMBER 2016	ROCK-TENN/RAYONIER/EIGHT FLAGS ROCK-TENN COMPANY / RAYONIER		2,325,000 2,325,000 2,325,000 2,325,000 2,325,000 16,200,000 16,201,000 16,201,000 16,201,000 16,201,000			2,325,000 2,325,000 2,325,000 2,325,000 2,325,000 16,200,000 16,201,000 16,201,000 16,201,000 16,201,000	4.508516 5.756430 5.756430 4.508516 5.756430 0.647056 0.826103 0.826103 0.647016 0.826103 0.826103	4.508516 5.756430 5.756430 4.508516 5.756430 5.756430 0.647056 0.826103 0.647016 0.826103 0.826103	104,823 133,837 133,837 104,823 133,837 104,823 133,837 133,837 104,823 133,837 133,837
TOTAL			111,155,000	0	0	111,155,000	1.340460	1.340460	1,489,988

JULY

2016

FLORIDA PUBLIC UTILITIES COMPANY

FLORIDA DIVISION-CONSOLIDATED

RESIDENTIAL BILL COMPARISON

ESTIMATED FOR THE PERIOD: JANUARY 2016 THROUGH DECEMBER 2016

MARCH

2016

APRIL

2016

OCTOBER NOVEMBER DECEMBER

MAY

2016

JUNE

2016

FEBRUARY

2016

SEPTEMBER

BASE RATE REVENUES ** \$	34.67	34.67	34.67	34.67	34.67	34.67	34.67
D/OCTOVICION CO	04.07		01.01	01.01	01.07	0 1.01	0 1.0
FUEL RECOVERY FACTOR CENTS/KWH	10.19	10.19	10.19	10.19	10.19	10.19	10.19
GROUP LOSS MULTIPLIER	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000	1.00000
FUEL RECOVERY REVENUES \$	101.89	101.89	101.89	101.89	101.89	101.89	101.89
GROSS RECEIPTS TAX	3.50	3.50	3.50	3.50	3.50	3.50	3.50
TOTAL REVENUES *** \$	140.06	140.06	140.06	140.06	140.06	140.06	140.06

	2016	2016	2016	2016	2016
BASE RATE REVENUES ** \$	34.67	34.67	34.67	34.67	34.67
FUEL RECOVERY FACTOR CENTS/KWH	10.19	10.19	10.19	10.19	10.19
GROUP LOSS MULTIPLIER	1.00000	1.00000	1.00000	1.00000	1.00000
FUEL RECOVERY REVENUES \$	101.89	101.89	101.89	101.89	101.89
GROSS RECEIPTS TAX	3.50	3.50	3.50	3.50	3.50
TOTAL REVENUES *** \$	140.06	140.06	140.06	140.06	140.06

JANUARY

2016

AUGUST

TOTAL
416.04
4 000 00
1,222.68 42.00
1,680.72

PERIOD

* MONTHLY AND CUMULATIVE TWELVE MONTH ESTIMATED DATA

** BASE RATE REVENUES PER 1000 KWH:

 CUSTOMER CHARGE
 14.00

 CENTS/KWH
 19.60

 CONSERVATION FACTOR
 1.07

34.67

EXHIBIT NO. _____ DOCKET NO. 150001-EI FLORIDA PUBLIC UTILITIES COMPANY (CDY-3) PAGE 8 OF 10

^{***} EXCLUDES FRANCHISE TAXES

Florida Public Utilities Company

FPL Interconnect

Calculation of the Actual Revenue Requirements

Projected 2016

Schedule A Exhibit_ Curtis D. Young (CDY-3) Page 9 of 10

<u>Item</u> Qualified Investment	Beginning Balance	Projected <u>Jan</u>	Projected <u>Feb</u>	Projected Mar	Projected Apr	Projected <u>May</u>	Projected <u>Jun</u>	Projected <u>Jul</u>	Projected Aug	Projected Sep	Projected Oct	Projected Nov	Projected Dec	Year End Total/Balance
Qualified Investment - Interconnect CWIP Activity Qualified Investment - Interconnect CWIP Activity to Plant Qualified Investment - Mains - Current 1010 Activity	\$291,667	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$145,833	\$1,750,000 \$0 \$0
Total Qualified Investment - Interconnect 1070 Activity Total Qualified Investment - Interconnect 1010 Total Qualified Investment	\$291,667 \$0 \$291,667	\$437,500 \$0 \$437,500	\$583,333 \$0 \$583,333	\$729,167 \$0 \$729,167	\$875,000 \$0 \$875,000	\$1,020,833 \$0 \$1,020,833	\$1,166,667 \$0 \$1,166,667	\$1,312,500 \$0 \$1,312,500	\$1,458,333 \$0 \$1,458,333	\$1,604,167 \$0 \$1,604,167	\$1,750,000 \$0 \$1,750,000	\$1,895,833 \$0 \$1,895,833	\$2,041,667 \$0 \$2,041,667	\$2,041,667 \$0 \$2,041,667
Less: Accumulated Depreciation Net Book Value	\$291,667	\$0 \$437,500	\$0 \$583,333	\$0 \$729,167	\$0 \$875,000	\$0 \$1,020,833	\$0 \$1,166,667	\$0 \$1,312,500	\$0 \$1,458,333	\$0 \$1,604,167	\$0 \$1,750,000	\$0 \$1,895,833	\$0 \$2,041,667	\$0 \$2,041,667
Average Net Qualified Investment	-	\$364,583	\$510,417	\$656,250	\$802,083	\$947,917	\$1,093,750	\$1,239,583	\$1,385,417	\$1,531,250	\$1,677,083	\$1,822,917	\$1,968,750	
Depreciation Rates Approved Depreciation Rate														
Return on Average Net Qualified Investment Equity - Cost of Capital, inclusive of Income Tax Gross-up Debt - Cost of Capital		7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	7.6400% 1.5600%	
Equity Component - inclusive of Income Tax Gross-up Debt Component Return Requirement	-	\$2,321 \$474 \$2,795	\$3,250 \$664 \$3,914	\$4,178 \$853 \$5,031	\$5,107 \$1,043 \$6,150	\$6,035 \$1,232 \$7,267	\$6,964 \$1,422 \$8,386	\$7,892 \$1,611 \$9,503	\$8,820 \$1,801 \$10,621	\$9,749 \$1,991 \$11,740	\$10,677 \$2,180 \$12,857	\$11,606 \$2,370 \$13,976	\$12,534 \$2,559 \$15,093	\$89,133 \$18,200 \$107,333
Investment Expenses	-	÷												
Depreciation Expense Property Taxes General Public Notice Expense & Customer Notice Expense	2.00%	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0	\$0 \$0 \$0 \$0 \$0
Total Expense	-	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Revenue Requirements	-	\$2,795	\$3,914	\$5,031	\$6,150	\$7,267	\$8,386	\$9,503	\$10,621	\$11,740	\$12,857	\$13,976	\$15,093	\$107,333
Net Revenue Requirements / (Surplus)		\$2,795	\$3,914	\$5,031	\$6,150	\$7,267	\$8,386	\$9,503	\$10,621	\$11,740	\$12,857	\$13,976	\$15,093	\$107,333
Surcharge Revenues Collected Month		\$ -	\$ -	\$ -	\$ -	\$ -	s -	\$ -	\$ -	\$ -	\$ - \$	-	\$ -	\$0
Beginning True-Up (Over) and Under Recovery for the Month Monthly Interest (Expense)/Income Ending (Over) and Under Recovery	\$ 2,236	<u>\$</u>	\$ 3,914 \$ - \$ 8,945	\$ 1	\$ 1	\$ 2		\$ 3	\$ 4	\$ 4	\$ 12,857 \$ \$ 5 \$ \$ 80,522 \$	6	\$ 7	\$ 35
Beg of Month Annual Interest Rate End of Month Annual Interest Rate Average Monthly Interest Rate		0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	0.08% 0.08% 0.007%	

Florida Public Utilities Company

FPL Interconnect Calculation of the Customer Savings Projected 2016 - 2025 Schedule A

Exhibit_____ redacted

Curtis D. Young (CDY-3)

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Prices and Costs for Generation Services (\$/MWh)

		(+/,									_
	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	-
JEA Costs											*
FPL											*
Price Differenti	38.74	40.10	39.78	28.02	26.47	31.12	29.67	26.20	27.18	22.03	
Indicative Net Benefits	to Custom	ers (\$ 000)									
Purchase Quantity											
Scenario (MW)	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	
10 MW	2,216	2,294	2,275	1,603	1,514	1,780	1,697	1,499	1,555	1,260	-
20 MW	4,432	4,588	4,551	3,205	3,028	3,560	3,394	2,998	3,109	2,521	

Load Factor, Northeast Division

0.65

[&]quot;These indicative prices are based on simulations of the financial costs of generation services, for Florida Power and Light and Jacksonville Electric Authority. The analyses utilize historical data available in the public domain, and resource plans filed before the Florida Public Service Commission. The underlying data are not complete in all dimensions; as a consequence, the analysis includes reasonable judgements and inferences where necessary."

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 150001-EI: FUEL AND PURCHASED POWER COST RECOVERY CLAUSE WITH GENERATING PERFORMANCE INCENTIVE FACTOR

2016 Projection Testimony of Mark Cutshaw On Behalf of Florida Public Utilities Company

1	Q.	Please state your name and business address.
2	A.	My name is P. Mark Cutshaw, 1750 S. 14 th Street, Suite 200,
3		Fernandina Beach, Florida 32034.
4	Q.	By whom are you employed?
5	A.	I am employed by Florida Public Utilities Company.
6	Q.	Could you give a brief description of your background and
7		business experience?
8	A.	I graduated from Auburn University in 1982 with a B.S. in
9		Electrical Engineering and began my career with Mississippi
10		Power Company in June 1982. I spent 9 years with Mississippi
11		Power Company and held positions of increasing responsibility
12		that involved budgeting, as well as operations and maintenance
13		activities at various Company locations. I joined FPUC in May
14		1991 as Division Manager in the Marianna (Northwest Florida)
15		Division. During my employment with Florida Public Utilities, I
16		have worked extensively in both the Northeast and Northwest
17		Divisions. Since joining FPUC, my responsibilities have included
18		all aspects of budgeting, customer service, operations and

1		maintenance in both the Northeast and Northwest Florida
2		Divisions. My responsibilities also included involvement with
3		Cost of Service Studies and Rate Design in other rate
4		proceedings before the Commission as well as other regulatory
5		issues. During 2015, I moved into my current role as Director,
6		Business Development and Generation.
7	Q.	Have you previously testified in this Docket?
8	A.	Yes, on numerous occasions.
9		
10	l.	Efforts to Reduce Fuel Costs
11	Q.	Has the Company investigated means to reduce costs for its
12		customers in its consolidated electric divisions?
13	A.	Yes. The Company has aggressively sought opportunities to
14		engage its current base load providers for both electric divisions
15		in discussions for an arrangement that would be more beneficial
16		for the FPUC customers. Since 2007, when purchased power
17		rates began to increase significantly from both providers, FPUC
18		has been very assertive in challenging each cost determination
19		performed by JEA and Southern Company that resulted in an
20		increase to the purchased power rate. These very focused and
21		steady efforts have resulted in the mitigation of increases in

purchased power costs for FPUC and its customers. In January 2011, the Company was also successful in completing an Amendment to the Gulf Power contract, reducing costs to customers in its NW division.

These same focused and steady efforts are continuing today and have resulted in a reduced rate of increase to FPUC and its customers.

The Company has also investigated other opportunities to reduce purchases power costs, including the possibility of contractual relationships with other wholesale power suppliers. As a result of this ongoing investigation into new opportunities, relationships were developed with other suppliers, informal studies of generation and transmission capacity arrangements were reviewed, and contract possibilities were discussed. Although realization of these opportunities is not possible until the expiration of the existing power purchase contracts, the information gathered has provided FPUC with invaluable market knowledge and material that will further assist with our further discussions. Among the notable information gleaned, the Company has determined that an FPL interconnect in its Northeast Division will provide future opportunities to save

1		customers on fuel costs and increase the reliability in the
2		Northeast Division.
3	Q.	Has the Company availed itself of other opportunities to produce
4		fuel cost savings?
5	A.	Yes. For instance, the Northeast Division provides service to
6		two paper mills on Amelia Island that have significant on site
7		generation capabilities. These relationships have created further
8		opportunities for some limited purchased power for FPUC.
9		FPUC has entered into arrangements with these alternative
10		power providers that have thus far proven very advantageous.
11		FPUC is continuing to look at these and all other avenues for
12		reducing purchased power costs.
13	Q.	What arrangements with "alternative power providers" do you
14		refer to?
15	A.	The first very successful arrangement that I am referring to is the
16		renewable energy contract with Rayonier Performance Fibers,
17		LLC, which was entered into in early 2012 and approved by the
18		Commission in Docket No. 120058-EQ. Through a cooperative
19		effort, FPUC and Rayonier were able to develop a purchased
20		power agreement that allows Rayonier to produce renewable
21		energy and sell that energy to FPUC at a cost below that of the

1		current wholesale power provided while still being beneficial to
2		Rayonier. Not only did this increase the amount of renewable
3		energy in the area, it provides lower cost energy that is passed
4		directly through to FPUC customers in the form of reduced
5		power cost.
6		Secondly, FPUC has completed the development of a
7		partnership with Eight Flags Energy, LLC to provide lower cost
8		reliable energy which will provide benefits to the FPUC
9		customers. The Commission has reviewed this agreement and
10		approved it in Docket No. 140185-EQ on December 30, 2014.
11		The combined heat and power facility owned by Eight Flags
12		Energy, LLC, a subsidiary of Chesapeake Utilities Corporation
13		(Chesapeake), will work directly with FPUC to provide additional
14		energy to FPUC. This new 20 megawatt generation facility will
15		provide significant cost savings to FPUC customers in both
16		divisions.
17	Q.	How have these new arrangements proven beneficial to the
18		Company?
19	A.	This new project it is expected to be in service by the second
20		quarter of 2016 and is expected to produce further significant
21		benefits for the Company and all of its electric customers.

All in all, this contract will secure added service reliability for the
Northeast Division while providing customers in both divisions
significant fuel and purchased power cost savings. It will do so
all while producing a lower environmental profile than would be
associated with locating traditional generation on the island or
with FPUC's purchased power options. Not only will this new
contract provide customers with lower cost energy, this contract
will also provide FPUC with negotiating leverage that is not
currently available. This added leverage is expected to
enhance our ability to negotiate beneficial contracts with large
wholesale power providers for future agreements and should
help with even further energy.

- II. New Efforts Targeting Additional Savings
 - Q. Can you provide additional information on the transmission interconnect project?
 - A. Yes. This is a significant project for FPUC, one that the Company has embarked upon specifically because we anticipate it will directly improve our ability to negotiate increased savings for our customers in our next power purchase agreements. Historically, FPUC's ability to secure competitive wholesale power quotations has been hindered by the limitation on the

	transmission interconnections providing power to FPOCs
	Northeast Division. At present, FPUC's 138 KV transmission is
	directly connected to the JEA 138 KV transmission network.
	The FPUC 138 KV transmission line is a dual circuit, single pole
	line which includes several miles transmission line in relatively
	inaccessible marshy areas. This transmission line serves as the
	only off-island power supply to Amelia Island. In order to resolve
	this issue for upcoming wholesale power proposals, FPUC is
	pursuing an interconnection with the Florida Power & Light's
	(FPL) transmission system, which is located in very close
	proximity to the existing FPUC transmission system. Not only
	will this additional interconnection provide for more competitive
	wholesale power options, this will provide much needed
·	redundancy to the power supply on Amelia Island and have a
	positive impact on the overall system reliability.
Q.	What type of construction will be necessary to accomplish the
	interconnection with FPL?
A.	The FPUC owned 138 KV transmission line is located
	approximately 750 feet (0.14 miles) from the FPL substation and
	runs in the existing right of way along with the FPL 230 KV

transmission line. The construction necessary will include

1		expansion of the existing FPL substation in which the necessary
2		transmission and system protection equipment will be placed in
3		order to allow for the interconnection of the FPUC 138 KV
4		transmission line. The FPUC 138 KV transmission will be re-
5		routed to parallel the FPL 230 KV transmission line into the
6		expanded substation. The new system design will provide for
7		improved system reliability on the transmission system and wil
8		afford FPUC the opportunity to reach other less expensive
9		generation sources while avoiding additional transmission
10		wheeling cost.
11		This additional interconnection with FPL will also provide
12		expanded opportunities should it become necessary and/or
13		advantageous to export power from the CHP generating
14		resources on Amelia Island. The ability to have more
15		opportunities and avoid one transmission wheel can provide
16		additional benefits to FPUC customers by maximizing revenues
17		for off system sales.
18	Q.	What is the projected in service date for the interconnection with
19		the FP&L transmission system?
20	A.	The exact date of the interconnection completion has not been
21		determined; but, is expected during the latter half of 2017.

1	Q.	Can you quantify or project the savings to be derived as a result
2		of this new interconnect with FPL?
3	A.	While we cannot specifically define what those savings will be,
4		nor will be able to do so until negotiations for future agreements
5		are complete, we have projected what we anticipate the savings
6		will be, as addressed in the testimony of FPUC's witness Young.
7	Q.	Are there other efforts underway to continue to provide lower
8		cost energy to FPUC customers?
9	A.	Yes. Due to the significant benefits that are provided to the
10		Rayonier and Eight Flags Energy projects, FPUC has continued
11		to identify other projects that provide similar benefits. These
12		projects include additional Combined Heat and Power (CHP)
13		projects, additional transmission line interconnections and
14		photovoltaic projects.
15	Q.	Can you provide additional information on the CHP projects?
16	A.	Yes. Although the projects have not been finalized at this point,
17		there are currently CHP projects in development. It is uncertain
18		whether or not these will be available for service in 2016; but,
19		work is ongoing with regard to the engineering and contractual
20		aspects of the projects. To be clear, these costs are not
21		included in the projections for 2016.

1	Q.	In addition to CHP, is FPUC also considering the feasibility of
2		solar photovoltaic projects?
3	A.	Yes. FPUC has determined that the development of smaller
4		solar photovoltaic systems within the FPUC electric service
5		territory is economically feasible and can provide benefits to the
6		rate payers. Based on this analysis, FPUC is working to acquire
7		the necessary property to construct a small scale (one to five
8		megawatts) PV installation. Not only will this increase the
9		renewable energy available to FPUC, the cost is expected to be
10		less than the current wholesale power cost, which will provide
11		additional benefits to FPUC customers. Additionally, exploration
12		into the inclusion of battery storage capacity in conjunction with
13		the PV installation is being considered. The output from these
14		systems have not been included in the projections.
15	Q.	Does this conclude your testimony?
16	A.	Yes.