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STATE OF FLORIDA

COMMISSIONERS: ART GRAHAM, CHAIRMAN JULIE I. BROWN DONALD J. POLMANN GARY F. CLARK ANDREW GILES FAY



DIVISION OF ECONOMICS JUDY HARLOW DIRECTOR (850) 413-6410

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Public Service Commission

September 10, 2019

Beth Keating, Esq. Gunster, Yoakley & Stewart, P.A. 215 South Monroe Street, Suite 601 Tallahassee, FL 32301 bkeating@gunster.com

Mike Cassel AVP, Regulatory and Governmental Affairs FPUC/Chesapeake 1750 South 14th Street, Suite 200 Fernandina Beach, FL 32034 mcassel@fpuc.com STAFF'S FIRST DATA REQUEST via e-mail

Re: Docket No. 20190160-GU: Joint petition for approval of swing service rider rates for January through December 2020, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.

Dear Ms. Keating & Mr. Cassel:

By this letter, Commission staff requests that Florida Public Utilities Company (FPUC) provide responses to the following questions.

- 1. Please provide Schedules A through D attached to the direct testimony of witness Derrick Craig in Excel format with formulas intact.
- 2. Referring to the direct testimony of witness Craig, Schedule D and please provide the docket number, if applicable, pertaining to the costs for Belvedere, \$376,362, and describe the nature of this agreement.
- 3. Schedule D in Docket No. 20180158-GU indicates the swing service rate actual cost for Pensacola NW was \$871,220. In the current Docket No. 20190160-GU, the swing service rate actual cost for Pensacola NW is \$5,227,320. Please explain the reasons for this increase.
- 4. Referring to Schedule D of Witness Craig's direct testimony, please discuss the basis for including Gunster Yoakley & Stewart costs in swing service rates.

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- 5. Referring to Schedule D of Witness Craig's direct testimony, please discuss the basis for including Miscellaneous Administrative Costs, \$5,076, in swing service rates and explain what is included in Miscellaneous Administrative Costs and how it differs from Temporary Assistance.
- 6. Referring to Schedule D of Witness Craig's direct testimony, please discuss new swing service contract with Peoples Gas System, \$1,036,868, and refer to the Commission docket (if applicable) that approved a special contract with Peoples Gas System.

Please file all responses electronically no later than September 24, 2019 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and electronic Filing Web Form. Please contact me at sguffey@psc.state.fl.us or at 850.413.6204 if you have any questions.

Thank you.

/s/Sevini Guffey Sevini Guffey Public Utility Analyst

cc: Office of the Commission Clerk