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April 21, 2020

BY E-PORTAL

Mr. Adam Teitzman, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20200091-EU- Proposed amendment of Rule 25-6.064, F.A.C., Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities; Rule 25-6.078, F.A.C., Schedule of Charges; Rule 25-6.115, F.A.C., Facility Charges for Conversion of Existing Overhead Investor-owned Distribution Facilities; and Rule 25-6.0343, F.A.C., Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements.

Dear Mr. Teitzman:

Attached for electronic filing in the referenced docket, please find Florida Public Utilities Company's Responses to Staff's SERC Data Requests in the referenced docket.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

Beth Keating
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BK
Cc// Sevini Guffey

Docket No. 20200091-EU- Proposed amendment of Rule 25-6.064, F.A.C., Contribution-in-Aid-of-Construction for Installation of New or Upgraded Facilities; Rule 25-6.078, F.A.C., Schedule of Charges; Rule 25-6.115, F.A.C., Facility Charges for Conversion of Existing Overhead Investor-owned Distribution Facilities; and Rule 25-6.0343, F.A.C., Municipal Electric Utility and Rural Electric Cooperative Reporting Requirements.

Florida Public Utilities Company's Responses Staff's First Data Request

1. **Recommended revision to Section (5) of Rule 25-6.064, F.A.C., states that new or upgraded overhead and underground facility costs applied to the formula in subsections (2) and (3) of Rule 25-6.064, F.A.C., should be based on the requirements of Rule 25- 6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, FAC., Safety Standards for Construction of New Transmission and Distribution Facilities.**

Would the above requirements:

- a) **Increase Florida Public Utilities Company's (FPUC) regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- b) **Reduce FPUC's regulatory costs?**
- c) **Increase FPUC'S transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- d) **Please describe typical types of transactional costs that would be incurred by FPUC to implement the proposed revision to Section (5) of Rule 25-6.064, F.A.C.**
- e) **Please provide an explanation for the estimated transactional costs and methodology used.**
- f) **Would the proposed revision to Section (5) of Rule 25-6.064, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?**

Company Responses:

- a) **FPUC does anticipate that regulatory costs will increase but does not expect it to exceed \$200,000 on an on-going basis.**

- b) FPUC does not expect a reduction in regulatory costs.
- c) No.
- d) Administrative costs associated with gathering and analysis of data for reporting, developing and filing the report.
- e) See d above.
- f) None that FPUC can identify at this time.

2. **Recommended revision to Section (2) of Rule 25-6.078, F.A.C., states that for the purpose of calculating the Estimated Average Cost Differential, cost estimates should reflect the requirements of Rule. 25-6.030, F.A.C., Storm Protection Plan, Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:**

- a) **Increase FPUC's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- b) **Increase FPUC's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- c) **Please provide typical types of transactional costs that would be incurred by FPUC to implement the proposed revision to Section (2) of Rule 25-6.078, F.A.C.**
- d) **Please provide an explanation for the estimated transactional costs and methodology used.**
- e) **Would the proposed revision to Section (2) of Rule 25-6.078, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?**

Company Responses:

- a) FPUC does anticipate that regulatory costs will increase but does not expect it to exceed \$200,000 on an on-going basis.

- b) FPUC does not expect a reduction in regulatory costs.
 - c) No.
 - d) Administrative costs associated with gathering and analysis of data for reporting, developing and filing the report.
 - e) See d above.
 - f) None that FPUC can identify at this time.
3. **Recommended revisions to Section (8)(a) of Rule 25-6.115, F.A.C., states that, the charge for the proposed underground facilities shall include: The estimated cost of construction of the underground distribution facilities based on the requirements of Rule 25-6.030 Storm Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities, including the construction cost of the underground service lateral(s) to the meter(s) of the customer(s); Would the above requirements:**
- a) **Increase FPUC's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
 - b) **Reduce FPUC's regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.**
 - c) **Increase FPUC's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
 - d) **Please describe typical types of transactional costs that would be incurred by FPUC to implement the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C.**
 - e) **Please provide an explanation for the estimated transactional costs and methodology used.**
 - f) **Would the proposed revision to Section (8)(a) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small**

counties defined in Chapter 120.541(2)(e), F.S.?

Company Responses:

- a) FPUC does anticipate that regulatory costs will increase but does not expect it to exceed \$200,000 on an on-going basis.
- b) FPUC does not expect a reduction in regulatory costs.
- c) No.
- d) Administrative costs associated with gathering and analysis of data for reporting, developing and filing the report.
- e) See d above.
- f) None that FPUC can identify at this time.

4. Recommended revisions to Section (9) of Rule 25-6.115, F.A.C., states that, the charge for overhead facilities shall be the estimated construction cost to build new overhead facilities, including the service drop(s) to the meter(s) of the customer(s). Estimated construction costs shall be based on the requirements of Rule 25-6.030 Storm Protection Plan, F.A.C., Rule 25-6.034, F.A.C., Standard of Construction, Rule 25-6.0341, F.A.C., Location of the Utility's Electric Distribution Facilities, and Rule 25-6.0345, F.A.C., Safety Standards for Construction of New Transmission and Distribution Facilities. Would the above requirements:

- a) **Increase FPUC's regulatory costs in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- b) **Reduce FPUC'S regulatory costs pursuant to the proposed revisions as opposed to the existing requirements? Please explain.**
- c) **Increase FPUC's transactional costs (such as filing fees, license fees, cost of equipment required to be installed/used, procedures required to comply with rule requirements, additional operating costs, monitoring and/or reporting costs, and any other costs necessary to comply with the rule) in excess of \$200,000 in the aggregate within one year after implementation of the rule?**
- d) **Please describe typical types of transactional costs that would be incurred by FPUC**

to implement the proposed revision to Section (9) of Rule 25-6.115, F.A.C.

- e) Please provide an explanation for the estimated transactional costs and methodology used.**
- f) Would the proposed revision to Section (9) of Rule 25-6.115, F.A.C., have any adverse or positive impacts on small businesses, small cities, or small counties defined in Chapter 120.541(2)(e), F.S.?**

Company Responses:

- a) FPUC does anticipate that regulatory costs will increase but does not expect it to exceed \$200,000 on an on-going basis.
- b) FPUC does not expect a reduction in regulatory costs.
- c) No.
- d) Administrative costs associated with gathering and analysis of data for reporting, developing and filing the report.
- e) See d above.
- f) None that FPUC can identify at this time.