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August 2, 2022

BY E-PORTAL

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

#### Re: Docket No. 20220049-EI: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company

Dear Mr. Teitzman:

Attached for filing on behalf of Florida Public Utilities Company, please find the following documents correcting the Rebuttal Testimony of Robert C. Waruszewski consistent with Order No. PSC-2022-0292-PCO-EI:

- Errata of Robert C. Waruszewski
- Attachment 1 Rebuttal Testimony of Robert C. Waruszewski [type/strike version].
- Attachment 2 Rebuttal Testimony of Robert C. Waruszewski [clean version with Exhibit RCW-1, originally filed June 21, 2022 (04173-2022)].

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

cc:(Certificate of Service)

#### BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Review of Storm Protection Plan pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company DOCKET NO. 20220049-EI

DATED: August 2, 2022

#### <u>FLORIDA PUBLIC UTILITIES COMPANY'S</u> ERRATA SHEET TO THE REBUTTAL TESTIMONY OF ROBERT WARUSZEWSKI

Consistent with Order No. PSC- 2022-0292-PCO-EI, issued August 1, 2022, Florida Public Utilities Company ("FPUC") hereby submits this Errata Sheet to correct the Rebuttal Testimony of its witness Robert Waruszewski consistent with the Prehearing Officer's Order on the Motions to Strike. The portions of Mr. Waruszewski's Rebuttal Testimony addressed by this Errata are responsive to the stricken portions of the Office of Public Counsel's Witness Kollen's testimony.

Page and Line Number	Correction	
Page 4, Lines 1-22	Strike all	
Page 5, Lines 1-23	Strike all	
Page 6, Lines 1-23	Strike all	
Page 7, Lines 1-22	Strike all	
Page 8, Lines 1-8	Strike all	

Attached hereto as Attachment 1, is a copy of Mr. Waruszewski's Rebuttal Testimony with the indicated corrections in strike-through format. Also attached, as Attachment 2, is Mr. Waruszewski's Rebuttal Testimony in a clean version with the stricken portions removed. For

purposes of the record, the pages and line numbers have been maintained consistent with the original version filed on June 21, 2022. FPUC reserves, however, its right to offer the complete Rebuttal Testimony of Mr. Waruszewski, as originally filed, depending upon further action as it relates to Order No. PSC-2022-0292-PCO-EI.

Respectfully submitted this 2<sup>nd</sup> day of August, 2022,

By: Jet thete

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

## **<u>CERTIFICATE OF SERVICE</u>**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 1<sup>st</sup> day of August, 2022.

Jacob Imig Walt Trierweiler Lee Eng Tan Florida Public Service Commission 2540 Shumard Oak Boulevard	Mike Cassel Florida Public Utilities Company 208 Wildlight Ave. Yulee, FL 32097 <u>mcassel@fpuc.com</u>
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Richard Gentry/P. Christensen/A.	
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	I

By: \_\_\_\_\_

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# ATTACHMENT 1

Docket No. 20220049-EI

Rebuttal Testimony of Robert Chester Waruszewski

On Behalf of

Florida Public Utilities Company

Date of Filing: June 21, 2022 [Corrected by Errata: August 2 2022]

Type/Strike

1		<b>Before the Florida Public Service Commission</b>
2		Docket No. 20220049-EI
3		In re: Petition for Review of Storm Protection Plan
4		Rebuttal Testimony of Robert Chester Waruszewski
5		On Behalf of
6		Florida Public Utilities Company
7		Date of Filing: June 21, 2022 [Corrected by Errata: August 2, 2022]
8	I.	Background
9	Q.	Please state your name and business address.
10	А.	My name is Robert C. Waruszewski. My business address is 500 Energy Lane, Suite
11		100, Dover, Delaware 19901.
12	Q.	By whom are you employed and in what capacity?
13	А.	I am employed by Chesapeake Utilities Corporation as Regulatory Manager, South.
14	Q.	Briefly state your education background and employment experience.
15	А.	I received a Bachelor of Science Degree in mathematics and economics from St.
16		Vincent College, Latrobe, Pennsylvania. After graduation, I worked as a junior
17		accounting clerk for the Bank of New York Mellon, assisting in the preparation of
18		audits as well as gathering local tax data for the bank's employees before joining
19		Columbia Gas of Pennsylvania in November 2011 in the Regulatory Department.
20		There, I prepared rate case and gas cost filings and in 2013, I was promoted to Senior
21		Regulatory Analyst. I joined Peoples Natural Gas, a distribution company operating
22		in Pennsylvania, West Virginia, and Kentucky in December 2017, as the Senior Rates
23		and Regulatory Analyst, where I was responsible for assisting in budget preparation

and compiling regulatory filings for the Company's Pennsylvania and West Virginia
 affiliates. I was subsequently promoted to Finance and Rates Analyst IV. In January
 2022, I joined Chesapeake Utilities Corporation where my responsibilities include
 monthly filing of the Purchase Gas Adjustment (PGA), and other regulatory filings
 and analysis.

#### 6 Q. Have you testified before this or any other Commission?

- A. Yes, I provided testimony in FPUC's PGA True-Up filing at Docket No. 20220003GU. In addition, I have testified before the Pennsylvania Public Utility Commission
  in various gas cost proceedings for Peoples Natural Gas and in various Columbia Gas
  of Pennsylvania rate proceedings. In addition, I have testified before the Public Service
  Commission of Maryland on several occasions on behalf of Columbia Gas of
  Maryland.
- 13 Q. Did you file direct testimony in this proceeding?
- 14 A. No, I did not.

#### 15 II. <u>Purpose of Testimony</u>

16 Q. What is the purpose of your testimony?

A. The purpose of my testimony is to rebut various conclusions contained in the direct
testimony of the Office of Public Counsel's ("OPC") witness Lane Kollen pertaining
to the analysis of new programs proposed by FPUC in its Storm Protection Plan
("SPP") petition.

- 21 Q. Are you sponsoring any exhibits?
- A. Yes, I am sponsoring Exhibit RCW-1, which is a revised schedule submitted to remove
  the VA transformer project from FPUC's SPP revenue requirement.

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# Q. Do you agree with Witness Kollen's recommendations and assessments?

A. I do agree with some, but certainly not all of Witness Kollen's recommendations. In
this testimony, I will address the key items that I disagree with, as well as certain points
upon which I agree with Witness Kollen. To be clear, however, for any other
particulars of Witness Kollen's testimony that I do not specifically address, such
absence from this testimony should not be construed to mean that I either agree or
disagree with Witness Kollen.

Q. On page 9, lines 1 – 8, of his direct testimony, Witness Kollen recommends that
"The Commission should apply rational and specific decision criteria to the
selection, ranking, and magnitude of the proposed programs and projects and
apply those decision criteria consistently to all four utilities in these proceedings."
Do you agree with this recommendation?

No. Mr. Kollen applies an overly broad interpretation of 26-6.030 Florida 13 A. 14 Administrative Code ("F.A.C"). The Commission should, of course, apply rational and specific decision criteria, but the criteria should also recognize that each utility 15 16 operates in its own unique service area and has different operational needs. For 17 example, FPUC's service territory and customer base is much smaller and more rural than the other utilities in this proceeding. Thus, FPUC has unique needs not 18 experienced by the other utilities. While Section 366.96(4), Fla. Stat. provides the 19 20 four items for the Commission to consider when evaluating the storm protection plan, the Commission should have the discretion of how this applies to each utility and avoid 21 22 a one size fits all approach.

1	QOn page 9, lines 16-22, Witness Kollen-asserts-that, through-the-implementation
2	of the various Storm Protection Programs and projects, the utilities will achieve
3	cost savings through avoided costs and that these savings should be passed on to
4	customers either through a reduction to base rates or the SPPCRC. Do you agree
5	with this recommendation?

6 A. While I agree with Witness Kollen that the completion of the proposed SPP projects 7 will result in cost savings for customers in the long run, there is no way to quantify 8 from a monetary perspective the savings that will be achieved through this process. As 9 a result, there should not be an adjustment to base rates to reflect future savings as they 10 are unknown at this time. While the Company expects future restoration costs from 11 severe-storms-to-be-lower-by-completing-these-storm-projection-programs-and 12 enhancing system reliability, there is no reasonable way to quantify the savings 13 amount, since the restoration costs related to a severe storm are related to the timing 14 and damage of the storm in the future.

15 Nonetheless, FPUC-believes that customers will ultimately benefit from the proposed 16 SPP projects, both in terms of reduced outages and reduced restoration costs, which 17 will be realized by the customers through enhanced reliability, as well as reduced 18 storm damage and restoration costs that could be expected to be passed on to customers 19 following a storm through a surcharge or other mechanism. FPUC believes that the 20 proactive approach of its SPP, which contemplates upgrading the system 21 incrementally over a span of time prior to a severe storm occurrence is a more cost-22 effective way of maintaining the reliability of the electrical system than having to 1 2 replace a significant portion of the system in a rapid manner after a severe storm event occurs.

3

# Q. Do you agree with Witness Kollen's recommendation on page 10 of his direct testimony that the Commission reject all proposed projects that do not have a benefit-to-cost ratio of 100%?

7 -No.-My understanding of the definition of the SPP, as found in Section (2) (a) of 25-A.\_\_\_ 8 6.030 F.A.C. is that projects included in the SPP are to enhance FPUC's infrastructure 9 for the purpose of reducing restoration costs and outage-times and to improve the 10 Company's overall service reliability in the event of a storm. However, Mr. Kollen 11 appears to add an additional requirement to the evaluation of each project, a benefit 12 ratio of 100% It is not immediately clear how Mr. Kollen came up with a benefit ratio 13 of 100%, nor how that is to be applied in the instance of projects in the SPP. If a 14 eustomer of FPUC experiences reduced restoration costs and shorter outage times as 15 a result of the projects contained in the SPP, then, I would expect that most customers 16 would perceive that result to be 100% better than sitting in the dark in the Florida heat 17 waiting-on-restoration-following-an-extreme-weather-event.

#### 18 Q.—How should the Commission evaluate the prudency of the proposed projects?

19 The Company does not believe a quantification of estimated benefits vs costs of 20 enhanced storm protection is a meaningful guide on its own to assessing the prudency 21 of a project, in part because the benefits to be achieved are wide ranging and not easily 22 quantified. As stated in the statue, the estimated costs and benefits of making 23 improvements to the system are criteria the Commission is to consider, along with

1		reduced restoration costs and outage times, feasibility, reasonability and practicality
2		of storm protection, as well as the estimated rate impact on customers. These criteria
3		clearly provide a sufficient basis for the Commission to assess FPUC's SPP-while also
4		recognizing the Commission's regulatory expertise and its discretion to apply its
5		assessment in the appropriate context.
6	Q	On page 11, lines 1 and 2 of his direct testimony, Witness Kollen recommends
7		that costs associated with vegetation management and pole inspections be moved
8		from base rates to SPPCRC to ensure that costs are not double recovered. Do you
9		agree with this recommendation?
10	A	-Yes, this is ultimately the Company's long-term-intent, which the Company would
11		anticipate addressing in its next base rate proceeding. In the interim, the Company
12		agrees-that-there-should-be-no-"double-recovery" of costs and therefore has only
13		contemplated recovery of incremental amounts associated with certain items for which
14		a portion is already-recovered through base rates.
15	Q	Do you agree with Witness Kollen's statement on Pages 22 and 23 of his direct
16		testimony_that_the_Company_incorrectly_included_costs_incurred_prior_to_the
17		approval of the SPP in its SPP revenue requirement?
18	A <del>.</del>	The Company agrees with Mr. Kollen that the 75m-VA transformer project was
19		erroneously included in the revenue requirement and had revised the revenue
20		requirement to remove this project, since it already had been placed in service prior to
21		2022. This revision was provided in Attachment B-to OPC's Second Set of
22		Interrogatories and is provided as Exhibit RCW-1-to-my-rebuttal-testimonyHowever,
23		the Company believes that the estimated engineering and planning costs for 2022 SPP

1	ŧ	projects-are-appropriate-to-include-within-the-SPP-revenue-requirementThese
2	e	estimated engineering and planning costs would be incurred subsequent to the April
3	-1	11, 2022, filing of FPUC's SPP, and are therefore eligible for recovery under Rule 25-
4	6	5.031(6)(a), Florida Administrative Code.
5	QI	D o youngree-with Witness-Kollen's-assertion-on page-23, line 3, that-FPUC
6	i	improperly included depreciation expense on CWIP?
7	A]	The original schedule was designed as a high-level investment and did not reflect
8	e	details related to C WIP within the overall calculation. The Company agrees that CWIP
9	5	should not be included as a part of depreciation expense and has not included CWIP
10	i	in the computation of depreciation expense in the recently submitted 2022 E and 2023
11	ł	P-schedules at-Docket-No20220010-EI.
12	Q]	Do you agree with Witness-Kollen's statement on page 23, line 4, that FPUC
12 13	-	Do you agree with Witness-Kollen's statement on page 23, line 4, that FPUC improperly included property tax expense on CWIP?
	i	
13	i A.—]	improperly included property tax expense on CWIP?
13 14	i A.—]	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed
13 14 15	i A] 2	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed out annually, and therefore, there would not be CWIP balances. In the Company's
13 14 15 16	i A] 4	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed out annually, and therefore, there would not be CWIP balances. In the Company's 2022 E and 2023 P schedules submitted in Docket No. 20220010-EI, which contain a
13 14 15 16 17	i A] 4	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed out annually, and therefore, there would not be CWIP-balances. In the Company's 2022 E and 2023 P schedules submitted in Docket No. 20220010-EI, which contain a more detailed calculation of the SPP costs and revenue requirement, the Company has
13 14 15 16 17 18	i Al 2 1 1 Ql	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed out annually, and therefore, there would not be CWIP balances. In the Company's 2022 E and 2023 P schedules submitted in Docket No. 20220010-EI, which contain a more detailed calculation of the SPP costs and revenue requirement, the Company has not reflected property tax expense on CWIP.
<ol> <li>13</li> <li>14</li> <li>15</li> <li>16</li> <li>17</li> <li>18</li> <li>19</li> </ol>	i A] 4 9 9 9	improperly included property tax expense on CWIP? In the Company's original filing, it was assumed that CWIP projects would be closed out annually, and therefore, there would not be CWIP balances. In the Company's 2022 E and 2023 P schedules submitted in Docket No. 20220010-EI, which contain a more detailed calculation of the SPP costs and revenue requirement, the Company has not reflected property tax expense on CWIP. <b>Do you agree with Witness Kollen's statement on page 23, lines 5-12 that FPUC</b>

1		intent to double recover any costs related to vegetation management, but only the
2		incremental costs related to this program that are not already included in base rates.
3	<b>Q</b>	-Do you agree with Witness Kollen's recommendation on pages 25 and 26 of his
4		direct testimony to exclude CWIP from rate base and defer it as either AFUDC
5		or a miscellaneous deferred debit?
6	A	While the Company believes this is outside the scope of this proceeding and should be
7		handled in the SPPCRC proceeding, the Company is not opposed to excluding CWIP
8		from rate base and deferring it until the plant is placed in service.
9	Q.	Does this conclude your testimony?
10	A.	Yes.

# **ATTACHMENT 2**

Docket No. 20220049-EI

Rebuttal Testimony of Robert Chester Waruszewski

On Behalf of

Florida Public Utilities Company

Date of Filing: June 21, 2022 [Corrected by Errata: August 2, 2022]

Clean

1		<b>Before the Florida Public Service Commission</b>
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9	Q.	Does this conclude your testimony?
10	А.	Yes.

Revised Revenue Requirement Page 1 of 1

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#### Florida Public Utilities - Electric Division Storm Protection Plan Cost Recovery Clause Estimated Period: 2022 to 2031 Return on Capital Investments, Depreciation and Taxes

Line 1 Capital Investments	Rates	<b>2022</b> \$2,313,740	<b>2023</b> \$6,700,124	<b>2024</b> \$16;863,999	<b>2025</b> \$54,232,395	<b>2026</b> \$53,198,125	<b>2027</b> \$19,949,099	<b>2028</b> \$19,614,922	<b>2029</b> \$19,798,577	<b>2030</b> \$25,250,053	<b>2031</b> \$25,198,364	Year End Total/Balance \$243,119,398
2 Estimated Beginning Net Qualified Investment Estimated Ending Net Qualified Investment Estimated Average Net Qualified Investment	-	\$0 <u>\$2,283,892</u> \$1,141,946	\$2,283,892 \$8,838,655 \$5,561,274	\$8,838,655 \$25,257,056 \$17,047,856	\$25,257,056 \$78,138,175 \$51,697,615	\$78,138,175 <u>\$128,633,986</u> \$103,386,080	\$128,633,986 \$145,006,861 \$136,820,424	\$145,006,861 \$160,627,436 \$152,817,149	\$160,627,436 \$176,026,272 \$168,326,854	\$176,026,272 \$196,408,954 \$186,217,613	\$196,408,954 \$216,214,721 \$206,311,837	-
3 Return on Average Net Qualified Investment Equity Component - Grossed-Up for Taxes Debt Component Return Requirement	7.1300% 0.8200%	\$81,421 \$9,364 \$90,785	\$396,519 \$45,602 \$442,121	\$1,215,512 \$139,792 \$1,355,304	\$3,686,040 \$423,920 \$4,109,960	\$7,371,428 \$847,766 \$8,219,194	\$9,755,296 \$1,121,927 \$10,877,223	\$10,895,863 \$1,253,101 \$12,148,964	\$12,001,705 \$1,380,280 \$13,381,985	\$13,277,316 \$1,526,984 \$14,804,300	\$14,710,034 \$1,691,757 \$16,401,791	\$73,391,134 \$8,440,493 \$81,831,627
4 Investment Expenses Depreciation Expense Amortization Expense Property Taxes Other	2.58%	\$29,848 \$0	\$145,361 \$45,678	\$445,598 \$176,773	\$1,351,277 \$505,141	\$2,702,314 \$1,562,763	\$3,576,224 \$2,572,680	\$3,994,347 \$2,900,137	\$4,399,741 \$3,212,549	\$4,867,371 \$3,520,525	\$5,392,596 \$3,928,179	\$26,904,677 \$0 \$18,424,425 \$0_
Total Expense	_	\$29,848	\$191,039	\$622,371	\$1,856,418	\$4,265,077	\$6,148,904	\$6,894,484	\$7,612,290	\$8,387,896	\$9,320,775	\$45,329,102
5 Total System Recoverable Expenses (Lines 3 + 4)	\$120,633	\$633,160	\$1,977,675	\$5,966,378	\$12,484,271	\$17,026,127	\$19,043,448	\$20,994,275	\$23,192,196	\$25,722,566	\$127,160,729	