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October 14, 2022

**BY ELECTRONIC FILING**

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

**Re: Docket No. 20220010-EI: Storm Protection Plan Cost Recovery Clause**

Dear Mr. Teitzman:

Attached for electronic filing in the above-referenced docket, please find, on behalf of Florida Public Utilities Company, the Declaration of Michelle D. Napier, along with attached affidavit, regarding revisions required by Rule 25-6.031(2), F.A.C..

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,

/s/Beth Keating  
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: Storm Protection Plan Cost Recovery  
Clause

DOCKET NO. 20220010-EI

DATED: October 14, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S  
DECLARATION OF MICHELLE D. NAPIER**

As directed by Commission Staff in this proceeding, Florida Public Utilities Company ("FPUC," or "Company") hereby files this Declaration of Michelle D. Napier, along with the attached affidavit, whereby Ms. Napier hereby states as follows:

1. My name is Michelle D. Napier. My business address is 1635 Meathe Drive, West Palm Beach, Florida 33411.

2. I am employed by Florida Public Utilities Company (FPUC) as the Director, Regulatory Affairs - Distribution. In this role, my responsibilities include directing the regulatory activities for FPUC and Chesapeake Utilities Corporation ("CUC").

3. I prepared and caused to be filed direct testimony and exhibits in this proceeding on May 4, 2022. Thereafter, on August 18, 2022, I caused to be filed Revised Direct Testimony and my Revised Exhibit MDN-1, containing the revised and corrected SPPCRC Schedules E and P required in this proceeding, which reflect FPUC's actual/estimated and projected costs for 2022-2023 associated with implementation of its 2022-2031 Storm Protection Plan.

4. As this is FPUC's first year participating in this proceeding, the Company did not file any true-up costs for the previous year.

5. As addressed in my revised Direct Testimony, the costs included for recovery by FPUC in this proceeding pertain to the actual/estimated costs for 2022 and the projected costs for 2023 associated with the implementation of the Company's 2022-2031 Storm Protection Plan, addressed in Docket No. 20220049-EI.

6. On October 4, 2022, the Florida Public Service Commission ("Commission") approved FPUC's Storm Protection Plan in Docket No. 20220049-EI, but with modifications. Specifically, as reflected in the vote sheet, the Commission required removal of the Future T&D Enhancements program, as well as the Transmission and Substation Resiliency program. See, Document No. 08641-2022 in Docket No. 20220049-EI.

7. Pursuant to Rule 25-6.031(2), F.A.C., the Company is required to file an amended cost recovery petition and supporting testimony within 15 days of a Commission decision approving a plan with modifications.

8. However, as reflected in Revised Ex. \_\_ (MDN-1), FPUC's incurred and projected SPPCRC expenditures do not include costs for either of the removed programs. Changes, therefore, are not necessary to the Company's SPPCRC filing in this docket in light of the modifications required by the Commission in Docket No. 20220049-EI. *MDN*


*Michelle D Napier*

Michelle D. Napier, Declarant

Respectfully submitted this October 14, 2022,

By: /s/ Beth Keating

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706

*10/14/22*  


**CERTIFICATE OF SERVICE**

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 14th day of October, 2022:

Shaw Stiller Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850 <a href="mailto:ssiller@psc.state.fl.us">ssiller@psc.state.fl.us</a>	J. Jeffrey Wahlen/Malcolm Means/Virginia Ponder Ausley Law Firm Post Office Box 391 Tallahassee, FL 32302 <a href="mailto:jwahlen@ausley.com">jwahlen@ausley.com</a> <a href="mailto:mmeans@ausley.com">mmeans@ausley.com</a> <a href="mailto:vponder@ausley.com">vponder@ausley.com</a>
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Ms. Paula K. Brown Tampa Electric Company Regulatory Affairs P.O. Box 111 Tampa, FL 33601-0111 <a href="mailto:Regdept@tecoenergy.com">Regdept@tecoenergy.com</a>	Florida Industrial Users Power Group Jon C. Moyle, Jr. Moyle Law Firm 118 North Gadsden Street Tallahassee, FL 32301 <a href="mailto:jmoyle@moylelaw.com">jmoyle@moylelaw.com</a>

<p>Mike Cassel                  Florida Public Utilities Company                  208 Wildlight Ave.                  Yulee, FL 32097  <a href="mailto:mcassel@fpuc.com">mcassel@fpuc.com</a></p>	<p>Matthew Bernier                  Robert Pickels                  Stephanie Cuello                  Duke Energy                  106 East College Avenue, Suite 800                  Tallahassee, FL 32301  <a href="mailto:Matthew.Bernier@duke-energy.com">Matthew.Bernier@duke-energy.com</a>  <a href="mailto:Robert.Pickels@duke-energy.com">Robert.Pickels@duke-energy.com</a>  <a href="mailto:Stephanie.Cuello@duke-energy.com">Stephanie.Cuello@duke-energy.com</a></p>
	<p>Dianne M. Triplett                  Duke Energy                  299 First Avenue North                  St. Petersburg, FL 33701  <a href="mailto:Dianne.Triplett@duke-energy.com">Dianne.Triplett@duke-energy.com</a></p>
<p>Peter J. Mattheis/Michael K.                  Lavanga/Joseph Briscar                  NUCOR                  1025 Thomas Jefferson St., NW, Ste. 800                  West                  Washington DC 20007-5201                  (202) 342-0800                  (202) 342-0807  <a href="mailto:mkl@smxblaw.com">mkl@smxblaw.com</a>  <a href="mailto:pjm@smxblaw.com">pjm@smxblaw.com</a>  <a href="mailto:jrb@smxblaw.com">jrb@smxblaw.com</a></p>	

By:           /s/Beth Keating            
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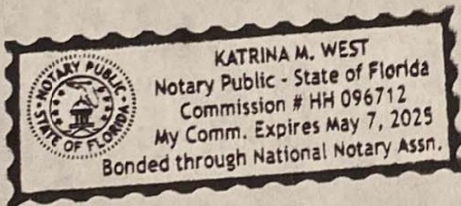
**AFFIDAVIT**

STATE OF FLORIDA)

COUNTY OF PALM BEACH)

I hereby certify that on this 14th day of October, 2022, before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, personally appeared Michelle D. Napier, who is personally known to me, and she acknowledged before me that she provided the attached Declaration of Michelle D. Napier in Docket No. 20220010-EI, and that the information contained therein is true and correct based on her personal knowledge. *mn*

In Witness Whereof, I have hereunto set my hand and seal in the State and County aforesaid as of this 14 day of October, 2022.



*Katrina M. West*  
\_\_\_\_\_  
Notary Public  
State of Florida, at Large

My Commission Expires:  
May 7, 2025