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STATE OF FLORIDA



DIVISION OF ECONOMICS
ELISABETH J. DRAPER
DIRECTOR
(850) 413-6410

Public Service Commission

September 2, 2025

STAFF'S FOURTH DATA REQUEST

Via Email

Beth Keating, Esquire
On behalf of Florida Public Utilities Company
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301
bkeating@gunster.com

Re: Docket No. 20250057-GU - Petition for approval of tariff modification for equipment financing, by Florida Public Utilities Company.

Dear Ms. Keating:

By this letter, the Commission staff respectfully requests Florida Public Utilities Company (FPUC or utility) provide responses to the following data requests:

1. Refer to FPUC's Petition in Docket No. 20250057 and subsequent responses regarding the proposed tariff provision for equipment financing.
 - a. Provide a detailed response describe how Florida City Gas (FCG) has historically applied its conversion tariff authorized by Commission Order No. PSC-1996-14 04-FOF-GU in Docket No. 19960502-GU. Specifically, address whether the utility's interpretation of "natural gas conversion equipment" for purposes of regulated cost recovery under Tariff Original Sheet Nos. 70, 73, and 77 was limited to (1) piping, other equipment related to connecting, safety, and other functions, but exclusive of the appliance itself), (2) piping, other equipment related to connecting, safety, and other function etc, and customer appliances, or (3) something else (please provide a specific description). If the interpretation included appliances, state which types of appliances were included. Provide any documents which support the utility's response to this request.
 - b. State whether FCG has ever altered its interpretation of "natural gas conversion equipment" to something other than what is stated in response to question 1.a. above. If applicable, detail the timing of such altered interpretation, and provide the specific justification or circumstances to support the altered interpretation. Provide any documents which support the utility's altered interpretation.

2. Refer to FPUC's existing tariff provisions. Explain how the utility has historically interpreted and applied the term "conversion" in its tariff (exclusive of the proposed equipment financing language). State whether "conversion" has been limited to piping and related facilities, or has also included appliances, and provide supporting documents.
3. Refer to FPUC's Response to Staff's First Data Request No. 1.h and to the accounting example in Attachment A to Staff's Second Data Request. FPUC indicates that repayment will be secured with a UCC-1 lien and a bad debt reserve of approximately \$42.
 - a. Please explain how these measures (UCC-1 lien and a bad debt reserve) adequately protect the utility's non-participating customers from financial risk associated with default on financed appliances with costs (1) up to a maximum value of \$2,500, or (2) for amounts of \$2,501 or more. Specifically, describe how the hypothetical reserve amount was calculated and the assumptions underlying that calculation.
 - b. Explain how carrying costs are treated in the event of default prior to recovery under the lien.
4.
 - a. Does FPUC agree that the market for gas appliances in its service territory is competitive? Why or why not?
 - b. Does FPUC agree that rates paid by the general body of ratepayers are subject to impacts from potential profit and loss outcomes of *any amount*, resulting from the proposed equipment financing tariff as a regulated service? Why or why not?
 - c. If FPUC answers affirmatively to 4.a and 4.b, what is the compelling basis for approving FPUC's petition to allow financing of appliances (specifically, tankless gas water heaters), if such financing is unrelated to the production, transmission, delivery or furnishing of heat, light, and power?

Please file all responses electronically no later than September 8, 2025 via the Commission's website at www.floridapsc.com by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gel@psc.state.fl.us.*

Please contact Bria Pope at (850) 413-6568 if you have any questions.

Sincerely,

/s/Bria Pope
Bria Pope
Public Utilities Analyst

cc: Office of the Commission Clerk
Michael Barrett, Economist Supervisor