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STATE OF FLORIDA



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Public Service Commission

January 15, 2025

STAFF'S THIRTY FIRST DATA REQUEST *via email*

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

RE: Docket No. 20240099-EI – Petition for rate increase by Florida Public Utilities Company.

Dear Ms. Keating:

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

For the following questions, please refer to the direct testimony of witness Haffecke, beginning on page 22.

1. Please refer to the direct testimony of witness Haffecke, page 13, lines 17 through 19. Please indicate if there are any potential cost savings, O&M or otherwise, associated with the replacement and rebuild of FPUC's Northeast substations, JL Terry and AIP. Please quantify these savings, if possible. If there are no savings associated with these projects, please explain why.

2. Please refer to the direct testimony of witness Haffecke, page 16, lines 14 through 17.
Please explain why FPUC did not elect to seek recovery of the self healing equipment through the Storm Protection Plan Cost Recovery Clause.
3. Please refer to the direct testimony of witness Haffecke, page 16, lines 20 through 21, and FPUC's response to Staff's Sixth Data Request, No. 25 for the following questions.
 - a) Please confirm that the manhole removal project consists of the replacement of eroding fibercrete vaults inside the manholes and explain how the Utility determined the vaults were eroding.
 - b) Please explain what FPUC uses the fibercrete manhole vaults for.
 - c) If additional activities outside of replacement of the fibercrete vaults are being conducted under this project, please identify these activities, how these activities were determined to be needed, and identify what costs requested are associated with them.
4. Please refer to FPUC's response to Staff's Sixth Data Request, No. 2. Regarding the Excel file provided for the new 75 MVA transformer installation project, please explain how the retirement amount was determined for the 50 MVA transformer. As part of this response, please identify the MFR schedule reflecting this retirement amount.
5. Please refer to FPUC's response to Staff's Sixth Data Request, No. 6(a). Please identify how much of the \$61,041 allocation to electric expense is internal employee costs, and how much is material costs. As part of this response, please detail what materials will be included in the material costs.

6. Please refer to FPUC's response to Staff's Sixth Data Request, No. 13. Please explain how FPUC selected the 10 live front projects.
7. Please refer to FPUC's response to Staff's Sixth Data Request, No. 27(f). Please detail the "other tasks" that other personnel will be able to focus on with the addition of the Line Supervisor positions.
8. Please refer to FPUC's response to Staff's Twentieth Data Request, No. 10(b) for the following questions.
 - a) Please indicate if other backup transmission service is currently available at the stepdown substation. If so, please identify the backup transmission service that is currently available, and explain why the installation of the 69 kV underground cable and switches is also necessary.
 - b) Please explain how FPUC currently minimizes interruptions to customers served by the stepdown substation during maintenance activities.

Please file all responses electronically no later than Wednesday, January 22, 2025, through 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-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413- 6218 if you have any questions.

Sincerely,

/s/ Suzanne Brownless

Suzanne Brownless

Special Counsel

SBr/ds

cc: Office of Commission Clerk