

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: May 21, 2025

TO: Office of Commission Clerk (Teitzman)

FROM: Division of Accounting and Finance (Quigley, D. Buys, Higgins) *ALM*
Office of the General Counsel (Bloom) *JSC*

RE: Docket No. 20250059-GU – Petition requesting approval of an updated AFUDC rate of 7.72%, effective January 1, 2025, by Florida City Gas.

AGENDA: 06/03/25 – Regular Agenda – Proposed Agency Action – Interested Persons May Participate

COMMISSIONERS ASSIGNED: All Commissioners

PREHEARING OFFICER: Administrative

CRITICAL DATES: None

SPECIAL INSTRUCTIONS: None

Case Background

Florida City Gas's (FCG or Company) currently approved Allowance for Funds Used During Construction (AFUDC) rate of 5.85 percent has been in effect since July 1, 2023.¹ On December 1, 2023, Chesapeake Utilities Corporation completed the acquisition of FCG from Florida Power & Light Company (FPL). The significance of this acquisition was that FCG's weighted average cost of capital increased by approximately 180 basis points as it transitioned from using the investor sources of capital and capital structure provided under FPL's ownership to the capital structure and cost rates under Chesapeake Utilities Corporation's ownership. On April 9, 2025, FCG filed a petition requesting approval of an updated AFUDC rate of 7.72 percent effective January 1, 2025. As required by Rule 25-7.0141(5), Florida Administrative Code (F.A.C.), FCG

¹Order No. PSC-2023-0376-PAA-GU, issued December 19, 2023, in Docket No. 20230108-GU, *In re: Request for approval to establish allowance for funds used during construction (AFUDC) rate of 5.85 percent, effective July 1, 2023, by Florida City Gas.*

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included Schedules A, B, and C which identify the capital structure, capital structure adjustments, and the methodology used to calculate the monthly AFUDC rate. Staff reviewed the schedules and determined that FCG did not provide all the information as required by Rule 25-7.01(5), F.A.C. On April 22, 2025, FCG filed revised Schedules A, B, and C including a revised long-term debt cost rate which lowered the Company's requested AFUDC rate to 7.65 percent.²

The Commission has jurisdiction over this matter pursuant to Chapter 366, Florida Statutes (F.S.), including Sections 366.04, 366.05, and 366.06, F.S.

² Document No. 03060-2025

Discussion of Issues

Issue 1: Should the Commission approve FCG's request to establish an AFUDC rate of 7.65 percent?

Recommendation: Yes. The appropriate AFUDC rate for FCG is 7.65 percent based on a 13-month average capital structure for the period ended December 31, 2024. (Quigley)

Staff Analysis: FCG filed a revised petition requesting approval of an AFUDC rate of 7.65 percent. Rule 25-7.0141(3), F.A.C., Allowance for Funds Used During Construction, provides the following guidance:

(3) The applicable AFUDC rate will be determined as follows:

(a) The most recent 13-month average embedded cost of capital, except as noted below, will be derived using all sources of capital and adjusted using adjustments consistent with those used by the Commission in the utility's last rate case.

(b) The cost rates for the components in the capital structure will be the midpoint of the last allowed return on common equity, the most recent 13-month average cost of short-term debt and customer deposits, and a zero cost rate for deferred taxes and all investment tax credits. The cost of long-term debt and preferred stock will be based on end of period cost. The annual percentage rate must be calculated to two decimal places.

In support of its requested AFUDC rate of 7.65 percent, FCG provided its calculations and capital structure in revised Schedules A and B. Staff reviewed the schedules and determined that the proposed rate was calculated in accordance with Rule 25-7.0141(3), F.A.C. In Schedule A, the Company appropriately used the mid-point return on equity of 9.50 percent, which was approved by Order No. PSC-2023-0177-FOF-GU.³ The increase in the AFUDC rate is due to an increase of 135 basis points in the weighted average cost rate of long-term debt, an increase of 31 basis points in the weighted average cost rate of short-term debt, and an increase of 16 basis points in the weighted average cost rate of common equity; offset by a decrease of 2 basis points in the weighted average cost rate of customer deposits. The AFUDC rate calculation and capital structure are presented in Attachment 1.

Based on its review, staff believes that the requested AFUDC rate of 7.65 percent is appropriate, consistent with Rule 25-7.041, F.A.C., and should be approved.

³Order No. PSC-2023-0177-FOF-GU, issued June 9, 2023, in Docket No. 20220069-GU, *In re: Petition for rate increase by Florida City Gas*.

Issue 2: What is the appropriate monthly compounding rate to achieve FCG's requested annual AFUDC of 7.65 percent?

Recommendation: The appropriate compounding rate to achieve an annual AFUDC rate of 7.65 percent is 0.006162. (Quigley)

Staff Analysis: FCG requested a revised monthly compounding rate of 0.006162 to achieve an annual AFUDC rate of 7.65 percent. In support of the requested monthly compounding rate of 0.006162, the Company provided its calculations in revised Schedule C attached to its request. Rule 25-6.0141(4)(a), F.A.C., provides the following formula for discounting the annual AFUDC rate to reflect monthly compounding:

$$M=[((1+A/100)^{1/12})-1] \times 100$$

Where: M = Discounted monthly AFUDC rate.

A = Annual AFUDC rate.

The rule also requires that the monthly compounding rate be calculated to six decimal places.

Staff reviewed the Company's calculation and determined it was derived in accordance with Rule 25-6.0141(4), F.A.C., as presented in Attachment 2. Therefore, staff recommends that a monthly compounding AFUDC rate of 0.006162 be approved.

Issue 3: Should the Commission approve FCG's requested effective date of January 1, 2025, for implementing the AFUDC rate?

Recommendation: Yes. The AFUDC rate should be effective January 1, 2025, for all purposes. (Quigley)

Staff Analysis: FCG's requested AFUDC rate was calculated using the most recent 13-month average capital structure for the period ended December 31, 2024. Rule 25-7.0141(6), F.A.C., provides that:

No utility may charge or change its AFUDC rate without prior Commission approval. The new AFUDC rate will be effective the month following the end of the 12-month period used to establish that rate and may not be retroactively applied to a previous fiscal year unless authorized by the Commission.

The Company's requested effective date of January 1, 2025, complies with the requirement that the effective date does not precede the period used to calculate the rate, and therefore, should be approved.

Issue 4: Should this docket be closed?

Recommendation: If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, this docket should be closed upon the issuance of a consummating order. (Bloom)

Staff Analysis: If no person whose substantial interests are affected by the proposed agency action files a protest within 21 days of the issuance of the order, this docket should be closed upon the issuance of a consummating order.

**FLORIDA CITY GAS
 CAPITAL STRUCTURE USED FOR THE REQUESTED AFUDC RATE
 AS OF DECEMBER 31, 2024**

COMPANY AS FILED				
<u>CAPITAL COMPONENTS</u>	<u>JURISDICTIONAL AVERAGE</u>	<u>CAPITAL RATIO</u>	<u>COST OF CAPITAL</u>	<u>WEIGHTED COST OF CAPITAL</u>
COMMON EQUITY	\$235,328,845	46.76%	9.50%	4.44%
LONG-TERM DEBT	\$215,852,423	42.89%	6.54%	2.80%
SHORT-TERM DEBT	\$34,694,377	6.89%	5.87%*	0.40%
CUSTOMER DEPOSITS	\$3,168,105	0.63%	2.31%*	0.01%
DEFERRED INCOME TAXES	\$5,051,503	1.00%	0.00%	0.00%
REGULATORY TAX LIABILITY	\$9,225,469	1.83%	0.00%	0.00%
TOTAL	\$503,320,722	100.00%		7.65%

* 13-MONTH AVERAGE

**FLORIDA CITY GAS
METHODOLOGY FOR MONTHLY COMPOUNDING AFUDC RATE
AS OF DECEMBER 31, 2024**

STAFF RECOMMENDED

<u>MONTHS</u>	<u>AFUDC BASE</u>	<u>MONTHLY AFUDC RATE</u>	<u>CUMULATIVE AFUDC RATE</u>
1	1.000000	0.006162	0.006162
2	1.006162	0.006200	0.012362
3	1.012362	0.006238	0.018600
4	1.018600	0.006277	0.024877
5	1.024877	0.006315	0.031192
6	1.031192	0.006354	0.047546
7	1.037546	0.006393	0.043940
8	1.043940	0.006433	0.050372
9	1.050372	0.006472	0.056845
10	1.056845	0.006512	0.063357
11	1.063357	0.006552	0.069909
12	1.069909	0.006593	0.076502

Annual Rate (R) = 0.0765

Monthly Rate = $((1+R)^{(1/12)})-1 = 0.006162$