

63

FPUC Responses to OPC's First Set of
Interrogatories,
Nos. 1-5.

(Including attachments)

(Revised responses to Nos. 1-2)

Interrogatory No. 1

INTERROGATORIES

For the following questions please refer to pages 3-4 of Mr. Mark Cutshaw's 2022 Projection Testimony where he briefly discusses legal and consultant fees that are included in the fuel clause.

1. Please provide the amount(s) included in the 2021 fuel factor(s) for the consulting fees.

Company Response:

Please see Excel file Attachment OPC Rog 1-2.

Respondent: Curtis Young

Interrogatory No. 2

2. Please provided the amount(s) included in the 2021 fuel factor(s) for legal services fees.

Company Response:

Please see Excel file Attachment OPC Rog 1-2 for Gunster, Yoakley and Stewart and Locke Lord LLP.

Respondent: Curtis Young

Interrogatory No. 3

3. For any and all project costs and related consultant fees included in the 2021 fuel factor(s), please provide a description for each of the project(s), the name of the consultant(s) working on the project(s) by project, and the amount of time the consultant(s) have spent on each of the project(s) by project by year included in the fuel factor(s) (i.e. 2020, 2021, and 2022).

Company Response:

2020:

Christensen Associates Energy Consulting \$4,477.00 consisting of 12-15 hours

Charges included work on the new and amended PPA's with FPL for both the NE FL and NW FL divisions.

Pierpont & McLelland, LLC: \$17,933.59 consisting of 100-120 hours

Charges included work to help assist with the new and amended PPA's (\$2,647.63) and work towards the development of the contracts and agreement related to the proposed Amelia Island Energy CHP (\$15,285.96).

Sterling Energy, LLC: \$74,600 consisting of 575-590 hours

Charges included work to assist with the development, design and related agreements necessary for the Amelia Island Energy CHP.

Barry Kennedy: \$0.00

2021 YTD:

Christensen Associates Energy Consulting: \$8,048 consisting of 20-25 hours

Charges included work on the PPA's with FPL for both the NE FL and NW FL divisions to assist with development of avoided cost information and renewable energy purchasing cost.

Interrogatory No. 3, cont.

Pierpont & McLelland, LLC: \$36,875.42 consisting of 200-215 hours

Charges included work to assist with development of strategic initiatives related to the FPL PPA's (\$6,229.99) and work towards the development of the contracts and agreement related to the proposed Amelia Island Energy CHP (\$30,645.43).

Sterling Energy, LLC: \$52,200.00 consisting of 345-365 hours

Charges included work to assist with the development, design and related agreements necessary for the Amelia Island Energy CHP under development.

Barry Kennedy: \$364.03 consisting of 3-5 hours

Charges included work to assist with the development and design necessary for the Amelia Island Energy CHP under development.

2022 Budget:

Christensen Associates Energy Consulting: \$20,000 consisting of 55-65 hours

Budget includes work on the PPA's with FPL for both the NE FL and NW FL divisions to renegotiate and update based on the incorporation of the Amelia Island Energy CHP under development.

Pierpont & McLelland, LLC: \$69,000 consisting of 380-400 hours

Budget includes work to assist with development of renegotiated PPA's with FPL due to the development of AIE (\$15,000) and work towards the development of the contracts and agreements related to the proposed Amelia Island Energy CHP (\$54,000).

Sterling Energy, LLC: \$120,000 consisting of 870-895 hours

Budget includes work to assist with the design, construction and related agreements necessary for the Amelia Island Energy CHP under development.

Barry Kennedy: \$0.00

Respondent: Mark Cutshaw

Interrogatory No. 4

4. For any and all project costs and related legal fees included in the 2021 fuel factor(s), please provide a description for each of the project(s) for any legal service fees incurred for working on the project(s) by project, and the amount of time the lawyer(s) have spent on each of the project(s) by project by year included in the fuel factor(s) (i.e. 2020, 2021, and 2022).

Company Response:

2020:

Gunster Yoakley & Stewart PA: \$3,722.35 consisting of 10-15 hours

Charges included work regarding the proposed Amelia Island Energy contracts and agreements (\$3,273.73) necessary to add this additional purchased power to the supply on Amelia Island and reviewing the Net Metering practices for FPU (\$448.62).

2021 YTD:

Gunster Yoakley & Stewart PA: \$1,954.82 consisting of 5-10 hours

Charges included work regarding the proposed Amelia Island Energy contracts and agreements (\$1,663.39) necessary to add this additional purchased power to the supply on Amelia Island and assistance with filing necessary documents related to this docket (\$291.43).

2022 Budget:

Gunster Yoakley & Stewart PA: \$4,000 consisting of 10-15 hours

Budget includes work regarding the proposed Amelia Island Energy contracts and agreements (\$3,500) necessary to add this additional purchased power to the supply on Amelia Island and assistance with filing necessary documents related to this docket (\$500).

Respondent: Mark Cutshaw

Interrogatory No. 5

5. Please identify the schedule(s) where the consultant and legal services fees are included in the fuel factors.

Company Response:

The consultant and legal services fees are included in Schedule E1, Page 1 on Line 10b 'Non-fuel Energy & Customer Costs of Purchased Power' of the Company's 2022 Fuel and Purchased Power Projection Exhibit CDY-3. These fees are also included in Schedule E-2 on Line 4 'Other Fuel Related Costs'.

Respondent: Curtis Young

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generating performance incentive
factor.

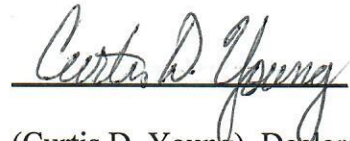
DOCKET NO. 20210001-EI

DATED: October 11, 2021

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 1, 2 and 5 in Docket No. 20210001-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.


(Curtis D. Young), Declarant

Dated: October 11, 2021

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generating performance incentive
factor.

DOCKET NO. 20210001-EI

DATED: October 11, 2021

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the OFFICE OF PUBLIC COUNSEL'S FIRST SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 3 and 4 in Docket No. 20210001-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.

**P. Mark
Cutshaw**

Digitally signed by P. Mark
Cutshaw
Date: 2021.10.11 10:32:26
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(P. Mark Cutshaw), Declarant

Dated: October 11, 2021

VENDOR	True-up 2020	Projected 2021
PIERPONT AND MCLELLAND LLC	7,127.81	69,000.00
STERLING ENERGY SERVICES LLC	86,269.98	120,000.00
CHRISTENSEN ASSOCS ENERGY CONSULTING LLC	8,469.97	20,000.00
LOCKE LORD LLP	3,211.48	
GUNSTER YOAKLEY & STEWART PA	5,528.75	4,000.00
FLORIDA PUBLIC UTILITIES CO	7,118.01	8,000.00
TOTALS	117,726.00	221,000.00

Attachment OPC Rog 1-2

Interrogatory No. 1

INTERROGATORIES

For the following questions please refer to pages 3-4 of Mr. Mark Cutshaw's 2022 Projection Testimony where he briefly discusses legal and consultant fees that are included in the fuel clause.

1. Please provide the amount(s) included in the 2021 fuel factor(s) for the consulting fees.

Company Response:

Please see Excel file Revised Attachment OPC Rog 1-2.

Respondent: Curtis Young

Interrogatory No. 2

2. Please provided the amount(s) included in the 2021 fuel factor(s) for legal services fees.

Company Response:

Please see Excel file Revised Attachment OPC Rog 1-2 for Gunster, Yoakley and Stewart and Locke Lord LLP.

Respondent: Curtis Young

VENDOR	True-up 2021	Projected 2022
PIERPONT AND MCLELLAND LLC	66,139.00	69,000.00
STERLING ENERGY SERVICES LLC	87,550.00	120,000.00
CHRISTENSEN ASSOCS ENERGY CONSULTING LLC	18,513.00	20,000.00
BARRY KENNEDY	364.00	
GUNSTER YOAKLEY & STEWART PA	4,144.00	4,000.00
FLORIDA PUBLIC UTILITIES CO	9,007.00	8,000.00
TOTALS	185,717.00	221,000.00

Revised Attachment OPC Rog 1-2

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Fuel and purchased power cost recovery
clause with generating performance incentive
factor.

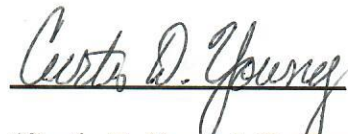
DOCKET NO. 20210001-EI

DATED: October 11, 2021

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the OFFICE OF PUBLIC COUNSEL'S REVISED FIRST SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 1 AND 2 in Docket No. 20210001-EI. The responses are true and correct to the best of my knowledge.

Under penalty of perjury, I declare that I have read the foregoing declaration and the interrogatory responses identified above, and that the facts stated therein are true.



(Curtis D. Young), Declarant

Dated: October 11, 2021