

**52**

**FPUC's Responses to Staff's Third Set of  
Interrogatories, Nos. 3-4.**

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

DOCKET NO. 20220001-EI

DATED: August 31, 2022

**FLORIDA PUBLIC UTILITIES COMPANY'S  
RESPONSES TO COMMISSION STAFF'S  
THIRD SET OF INTERROGATORIES (NO. 3-4)**

The Florida Public Utilities Company ("FPUC" or "Company"), hereby submits its Responses to the Third Set of Interrogatories (Nos. 3-4) served on the Company on August 11, 2022, by Commission Staff. The individual responses follow this cover sheet.

Respectfully submitted,

---

Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
(850) 521-1706  
*Attorneys for Florida Public Utilities  
Company*

INTERROGATORIES

1. Please refer to the Direct Testimony of Florida Public Utilities Company (FPUC or Company) witness Curtis Young, filed with the 2022 *Petition for Approval of Actual/Estimated True-Up Amount*, Schedule E-1b, for the following request.<sup>1</sup> Approximately half way thorough the schedule, directly under the line titled “Net Purchase Power,” is an unidentified/unnamed series of costs that sum to \$338,552 for the period. Please provide an amended schedule that specifically identifies the nature of this amount.

**Company Response:**

**The previously unidentified / unnamed series of costs that sum to \$338,552 for the period represent the monthly amortization of the COVID-19 regulatory asset. The settlement agreement, which was approved by the Commission on July 8, 2021, allows Florida Public Utilities Company to recover \$2,085,759 of pandemic-related incremental expenses. Beginning with the factors established for the calendar year 2022, FPUC was allowed to amortize over two years and recover the allocated regulatory asset of approximately \$1,354,120 for the electric division, through the Fuel and Purchased Power Cost Recovery Clause mechanism. The annualized amount, \$677,060, is included among the Company’s 2022 other fuel-related costs. The amended schedule that specifically identifies the nature of this amount is attached.**

*Respondent: Curtis D. Young*

---

<sup>1</sup>Document No. 05044-2022.

Interrogatory No. 4

4. Please refer to the Direct Testimony of FPUC witness Curtis Young, filed with the 2021 *Petition for Approval of Actual/Estimated True-Up Amount*, page 3, lines 1-3 for the following request.<sup>2</sup> Here the witness states: “[t]he Company is expecting a transmission rebate from its purchase power supplier, FP&L for approximately \$223,800 by year end and has included this amount in our 2021 true-up computation.” Please provide a citation of where this adjustment can be located in any Company filing, i.e. the 2021 actual/estimated filing, the final true-up of 2021 (filed in 2022), etc.

**Company response:**

**The transmission rebate from FP&L for approximately \$223,800 is embedded in the July 2021 Estimated Transmission Charge of the 2021 actual/estimated filing Schedule E1-b. The (\$13,759) is the net amount of the \$210,041 estimated transmission charges for the month and the \$223,800 transmission rebate from FP&L.**

**However, this rebate was not included in the Company’s actual final 2021 true-up filing since the \$223,836.14 rebate had not been received until January 2022.**

*Respondent: Curtis Young*

---

<sup>2</sup>Document No. 08344-2021.

**FLORIDA PUBLIC UTILITIES COMPANY**  
**STATEMENT OF UNPAID POWER COSTS AND CALCULATION OF TRUE-UP AND INTEREST PROVISION-EXCLUDING GSLD1**  
**ACTUAL/ESTIMATED FOR THE PERIOD: JANUARY 2022 THROUGH DECEMBER 2022**  
 BASED ON SIX MONTHS ACTUAL AND SIX MONTHS ESTIMATED  
 (EXCLUDES LINE LOSS - EXCLUDES TAXES)

Schedule E-1b

REVISED 8\_24\_2022

**CONSOLIDATED**

	ACTUAL Jan 2022	ACTUAL Feb 2022	ACTUAL Mar 2022	ACTUAL Apr 2022	ACTUAL May 2022	ACTUAL Jun 2022	Estimated Jul 2022	Estimated Aug 2022	Estimated Sep 2022	Estimated Oct 2022	Estimated Nov 2022	Estimated Dec 2022	Total
Total System Sales - KWH	50,563,833	52,662,584	41,047,718	47,358,687	49,156,724	58,657,139	63,545,221	64,752,875	65,260,871	60,414,202	51,313,429	52,520,067	657,253,349
West-Rock Purchases - KWH	900,000	1,810,000	370,000	460,000	440,000	320,000	190,000	350,000	590,000	320,000	530,000	440,000	6,720,000
Rayonier Purchases - KWH - On Peak	131,226	133,273	74,175	130,387	66,673	40,326	28,756	36,400	72,688	136,360	142,716	80,528	1,073,508
Rayonier Purchases - KWH - Off Peak	316,639	241,039	90,420	417,204	343,772	186,656	73,944	93,600	186,912	350,640	366,984	207,072	2,874,882
Eight Flags Purchases - KWH - KWH	12,748,671	11,807,895	13,073,484	13,164,892	13,222,346	12,069,632	14,300,000	13,100,000	14,700,000	14,600,000	13,900,000	14,700,000	161,386,920
FPL Purchases - KWH	18,425,776	13,205,121	13,122,513	12,633,789	19,067,131	25,550,860	25,191,871	26,054,355	24,053,431	19,035,033	15,309,443	12,167,266	223,816,590
Gulf Purchases - KWH	27,750,147	21,236,994	20,777,653	20,560,932	25,823,162	31,560,592	26,937,910	28,356,162	28,920,884	28,992,878	23,629,956	27,551,203	312,098,473
Generation Demand - KW - FPL	66,392	55,751	41,596	58,892	48,279	79,187	73,867	76,617	73,459	56,954	41,977	65,139	729,109
Generation Demand - KW - Gulf	66,389	62,845	51,801	44,465	56,855	68,127	62,800	63,800	61,500	51,800	47,200	65,100	702,682
Transmission Demand - KW - FPL	73,677	48,594	27,453	58,998	38,902	86,735	69,400	70,200	69,200	48,400	39,600	71,600	702,759
Transmission Demand - KW - Southern	55,120	0	0	0	0	0	25,500	25,300	23,900	24,200	24,200	24,800	203,020
Purchased Power Rates:													
West Rock Fuel Costs - \$/KWH	0.03880	0.03992	0.11288	0.04439	0.06417	0.09792	0.04824	0.04824	0.04824	0.04824	0.04824	0.04824	0.04824
Rayonier Energy Charge - On Peak - \$/KWH	0.03491	0.03442	0.03442	0.03524	0.11374	0.07633	0.05531	0.05531	0.05531	0.04799	0.05130	0.05130	0.05130
Rayonier Energy Charge - Off Peak - \$/KWH	0.03248	0.03195	0.03195	0.03208	0.09328	0.13311	0.05531	0.05531	0.05531	0.04799	0.05130	0.05130	0.05130
Eight Flags Charge - \$/KWH	0.11754	0.15133	0.13666	0.10760	0.15120	0.17457	0.14346	0.14346	0.14346	0.14346	0.15050	0.19993	0.19993
Base Fuel Costs - \$/KWH - FPL	0.03554	0.04933	0.04597	0.04309	0.05094	0.06515	0.04977	0.05043	0.05030	0.04909	0.05030	0.04431	0.04431
Base Fuel Costs - \$/KWH - GULF	0.03923	0.03974	0.03961	0.05167	0.06687	0.07276	0.04207	0.04284	0.04360	0.04393	0.04231	0.04349	0.04349
Energy Charge - \$/KWH - FPL	0.00212	0.00235	0.00237	0.00236	0.00216	0.00198	0.00211	0.00208	0.00205	0.00211	0.00219	0.00233	0.00233
Demand and Non-Fuel:													
Demand Charge - \$/KW - FPL	6.40977	6.65626	7.11797	6.56936	6.85940	6.23122	6.30189	6.26412	6.30774	6.61428	7.10103	6.63407	6.63407
Demand Charge - \$/KW - Gulf	7.84154	7.98768	8.57136	8.11933	8.27612	7.77543	7.98965	7.94671	8.04756	8.57143	8.89513	7.98286	7.98286
Distribution Facility Charge	5.09680	5.09680	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600	5.82600
Transmission Charge \$/KW - FPL	2.49638	3.16551	3.21568	2.83813	3.04149	2.73832	2.97966	2.97966	2.97966	2.97966	2.97966	2.97966	2.97966
Transmission Charge \$/KW - Southern	3.01632	3.01632	3.01631	3.01635	3.06438	3.31430	2.17647	2.13805	1.94602	1.76038	1.16505	1.82440	1.82440
Purchased Power Costs:													
West-Rock Fuel Costs	34,916	72,253	41,764	20,418	28,233	31,335	9,166	16,884	28,462	15,437	25,567	21,226	345,661
Rayonier Standby Costs	14,865	12,288	5,441	17,980	39,651	27,924	5,680	7,189	14,358	23,371	26,147	14,754	209,648
Eight Flags	1,498,433	1,786,942	1,786,008	1,416,551	1,999,213	2,107,046	2,051,478	1,879,326	2,108,862	2,094,516	2,091,950	2,938,971	23,759,896
Gulf Base Fuel Costs	1,088,556	843,868	823,006	1,062,371	1,726,885	2,296,315	1,133,224	1,214,897	1,260,841	1,273,721	999,787	1,198,220	14,921,691
FPL Base Fuel Costs	654,879	651,376	603,214	544,337	971,317	1,664,689	1,253,703	1,314,003	1,209,870	934,387	770,051	539,088	11,110,914
Gulf/FPL Fuel Adjustment	97,958	80,999	80,424	78,224	96,796	113,329	110,084	113,000	108,851	101,353	85,219	92,612	1,158,849
Subtotal Fuel Costs	3,389,607	3,447,726	3,340,457	3,139,881	4,862,095	6,240,638	4,563,335	4,545,299	4,731,244	4,442,785	3,998,721	4,804,871	51,506,659
Demand and Non-Fuel Costs:													
Demand Capacity Charge	946,150	873,079	740,084	792,374	801,704	1,023,149	967,249	986,941	958,285	820,707	717,927	886,252	10,513,901
Distr. Fac. Charge-Gulf	302,935	299,779	300,013	299,729	217,103	307,112	329,169	328,004	319,847	321,595	321,594	325,091	3,665,971
Customer Charges	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	4,000	48,000
Transmission Charge	(39,910)	153,825	88,280	167,444	118,320	237,508	208,788	209,172	206,192	144,215	117,995	213,344	1,823,173
Subtotal Demand & Non-Fuel Costs	1,213,175	1,330,683	1,132,377	1,263,547	1,141,127	1,565,769	1,507,206	1,528,117	1,488,324	1,290,517	1,161,516	1,428,687	16,051,045
Total System Purchased Power Costs	4,602,782	4,778,409	4,472,834	4,403,427	6,003,222	7,806,407	6,070,541	6,073,416	6,219,568	5,733,302	5,160,237	6,233,558	67,557,703
Less Direct Billing To GSLD1 Class:													
Demand	146,953	15,778	17,231	59,304	47,821	13,987	799	24,526	3,195	0	7,729	16,797	354,119
Commodity	103,355	123,045	67,032	40,675	17,811	39,813	142,894	186,169	182,113	249,989	366,484	225,651	1,745,031
Net Purchased Power Costs	4,352,475	4,639,586	4,388,571	4,303,449	5,937,590	7,752,607	5,926,848	5,862,721	6,034,260	5,483,313	4,786,024	5,991,110	65,458,553
COVID-19 Reg Asset amort.			0	0	0	0	56,422	56,422	56,422	56,422	56,422	56,422	338,532
Special Costs*	14,063	13,177	22,541	5,836	46,358	17,201	17,850	17,850	19,300	17,850	17,850	20,300	230,177
Total Costs and Charges	4,366,538	4,652,763	4,411,112	4,309,285	5,983,947	7,769,808	6,001,120	5,936,993	6,109,982	5,557,585	4,860,296	6,067,832	66,027,262
Sales Revenues - Fuel Adjustment Revenues:													
RS<	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	0.06984	
RS>	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	0.08233	
GS	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	0.07384	
GSD	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	0.06790	
GSLD	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	0.06526	
LS	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	0.04953	
Unbilled Fuel Revenues	(63,823)	190,884	(236,547)	(94,727)	439,242	171,155	0	0	0	0	0	0	406,185
Total Fuel Revenues (Excl. GSLD1)	3,345,517	3,671,365	2,569,730	2,862,209	3,568,554	4,270,264	4,416,943	5,378,523	5,427,955	4,916,583	4,029,810	4,302,028	48,759,480
GSLD1 Fuel Revenues -17197	250,308	138,823	84,263	99,979	65,632	53,800	143,693	210,695	185,308	249,989	374,213	242,448	2,099,150
Non-Fuel Revenues	3,182,802	3,280,960	2,769,978	2,862,830	2,931,672	2,582,841	2,758,327	2,460,936	2,404,991	1,774,794	1,837,713	2,343,379	31,211,222
Total Sales Revenue	6,778,627	7,091,147	5,423,971	5,845,017	6,565,858	6,906,905	7,318,963	8,050,153	8,018,254	6,941,367	6,241,736	6,887,855	82,069,853
KWH Sales:													
RS<	18,284,936	19,123,008	16,471,544	16,408,065	17,204,455	20,098,709	20,749,996	20,669,362	20,687,561	20,063,120	17,580,267	18,133,268	225,474,291
RS>	6,855,113	8,538,252	3,289,155	3,355,668	4,523,901	9,671,691	12,049,061	11,840,807	11,623,024	7,542,299	4,118,691	4,941,846	88,349,598
GS	4,318,888	4,402,693	3,802,918	4,124,579	4,348,747	5,547,905	5,144,366	5,375,083	5,418,462	5,474,878	4,494,166	4,687,008	57,949,602
GSD	12,164,409	11,578,075	11,171,290	12,511,069	12,856,335	15,396,474	15,682,						

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

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

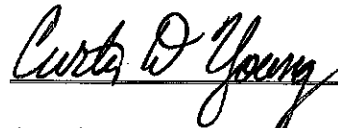
DOCKET NO. 20220001-EI

DATED: August 29, 2022

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to the STAFF'S  
THIRD SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos.  
3 - 4 in Docket No. 20220001-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: August 29, 2022