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**FPUC's response to staff's third set of
interrogatories Nos. 40-46**

Interrogatory No. 40

40. Referring to witness Cutshaw's testimony on page 4, line 19, please explain what activities are included as SPP Management for \$200,000 from May through December 2022.

Company Response: FPUC has reviewed the 2022 cost and does not feel it is feasible to put this position in place during 2022 and has modified Exhibits in MDN-1 to show this cost being removed.

Respondent: Mark Cutshaw

Interrogatory No. 41

41. Referring to witness Cutshaw's testimony on page 5, line 4, please explain what activities are included as SPP Management for \$210,000 from January through December 2023.

Company Response: This is a Full Time Equivalent (FTE) position that will be responsible for continued development, monitoring and administration of the FPU SPP. This position will be responsible for the tracking of the FPUC SPP projects, scheduling work to be performed and cost control/data collection necessary for the success of the program as well as documentation necessary for the inputs to the Cost Recovery for the FPUC SPPCRC.

Respondent: Mark Cutshaw

Interrogatory No. 42

42. Witness Napier's testimony, page 3, lines 17-19, indicates \$3,706,470 as the projected 2022 (May through December) SPP costs, while witness Cutshaw's testimony indicates \$3,710,000 for the same time period. Please explain and/or reconcile the differences.

Company Response: Mr. Cutshaw's testimony uses rounded numbers whereas Witness Napier's testimony indicates the exact amounts. The below table reconciles the variance.

	Cutshaw	Napier	
Item	Testimony	Exhibit	Variance
Distribution Overhead Feeder Hardening	300,000	298,375	1,625
Distribution Overhead Lateral Hardening	60,000	57,745	2,255
Distribution Overhead Lateral Undergrounding	110,000	112,278	(2,278)
T&D Vegetation Management	1,200,000	1,200,000	0
Distribution Pole Inspection & Replacement	1,220,000	1,221,072	(1,072)
Transmission Inspection & Hardening	620,000	617,000	3,000
SPP Management	200,000	200,000	0
Total	3,710,000	3,706,470	3,530

Respondent: Mark Cutshaw

Interrogatory No. 43

43. Witness Napier's testimony, page 4, lines 1-4, indicates \$8,257,657 as the projected 2023 (January through December) SPP costs, while witness Cutshaw's testimony indicates \$8,260,000 for the same time period. Please explain and/or reconcile the differences.

Company Response: Mr. Cutshaw's testimony uses rounded numbers whereas Witness Napier's testimony indicates the exact amounts. The below table reconciles the variance

	Cutshaw	Napier	
Item	Testimony	Exhibit	Variance
Distribution Overhead Feeder Hardening	3,010,000	3,013,348	(3,348)
Distribution Overhead Lateral Hardening	580,000	577,452	2,548
Distribution Overhead Lateral Undergrounding	1,120,000	1,122,786	(2,786)
T&D Vegetation Management	1,200,000	1,200,000	0
Distribution Pole Inspection & Replacement	1,520,000	1,521,072	(1,072)
Transmission Inspection & Hardening	620,000	617,000	3,000
SPP Management	210,000	206,000	4,000
Total	8,260,000	8,257,657	2,343

Respondent: Mark Cutshaw

Interrogatory No. 44

44. Witness Cutshaw's testimony on page 5, lines 10-18, indicates a total amount to be recovered in 2022 through the SPPCRC is \$1,335,000. Witness Napier's testimony on page 3, lines 6-7 indicates the amount of \$804,926 to be recovered through the SPPCRC. Please explain the differences indicated by the two witnesses.

Company Response: The amount mentioned in Witness Cutshaw's testimony is the projected costs of both the O&M and Capital portions of the SPPCRC programs that will be incurred in 2022, while the amount in Witness Napier's testimony is the revenue requirement associated with both the O&M and capital project costs for 2022.

Respondent: Mark Cutshaw

Interrogatory No. 45

45. Witness Cutshaw's testimony on pages 5, lines 20 through 23 and page 6, lines 1 through 3, indicates a total amount to be recovered in 2023 through the SPPCRC is \$5,585,000. Witness Napier's testimony on page 3, line 16 and Exhibit No. MDN-1, page 24 of 58 indicates the amount to be recovered is \$2,012,718 through the SPPCRC. Please explain the differences indicated by the two witnesses.

Company Response: The amount mentioned in Witness Cutshaw's testimony is the projected costs of both the O&M and Capital portions of the SPPCRC programs that will be incurred in 2023, while the amount in Witness Napier's testimony is the revenue requirement associated with both the O&M and capital project costs for 2023.

Respondent: Mark Cutshaw

Interrogatory No. 46

46. Referring to witness Napier's testimony, on page 4, line 4, please confirm whether \$6,700,124 is for capital costs.

Company Response: Yes, the \$6,700,124 is for capital costs.

Respondent: Mark Cutshaw

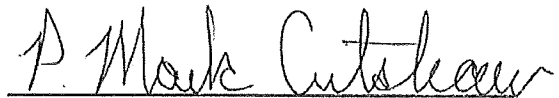
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Storm Protection Plan Cost Recovery Clause	DOCKET NO. 20220010-EI
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DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to the COMMISSION STAFF'S THIRD SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 32 – 33 AND 36 – 46 in Docket No. 20220010-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), Declarant

Dated: August 12, 2022