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**FPUC's response to staff's sixth set of  
interrogatories No. 51-52**

INTERROGATORIES

51. Is FPUC aware if any other Florida Investor-Owned Electric Utility -- Duke Energy Florida, Florida Power & Light, or Tampa Electric Company -- intends to recover the cost of any of its Storm Protection Plan programs in 2023 through a demand charge for demand-metered customers?

Company Response:

Initially, FPUC was unaware of how other utilities were charging demand-metered customers. However, upon review of Wal Mart's testimony in this proceeding, and responding to Commission staff interrogatories, it has become apparent that other Florida IOUs apparently intend to recover cost of its Storm Protection Plan programs in 2023 through a demand charge for demand-metered customers.

*Respondent: Michelle Napier*

Interrogatory No. 52

52. Please explain why FPUC believes it is appropriate to recover the cost of its Storm Protection Plan program in 2023 from demand-metered customers through an energy charge.

**Company Response:**

FPUC believes it is appropriate to recover the costs of its Storm Protection Plan program in 2023 from demand-metered customers through an energy charge because the Company currently recovers clause costs to demand-metered customers through an energy charge, specifically its fuel clause.

*Respondent: Michelle Napier*

## DECLARATION

Docket No. 20220010-EI. The responses are true and correct to the best of my knowledge.

interrogatory responses identified above, and that the facts stated therein are true.

*Michelle Napier*

Michelle Napier, Declarant

Dated: October 12, 2022