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**FPUC's Responses to Staff's Fifth Set of
Interrogatories Nos. 29-31**

Interrogatory No. 29

INTERROGATORIES

29. Please refer to witness Bennet's testimony, Page 10, Line 21 through Page 13, Line 12. Explain if the Company intends to allow non-FPUC natural gas companies to utilize the facilities at the Florida Safety Town?
- a. If so, please provide an estimate of the annual revenue and a breakdown of the fees that would be charged.
 - b. Please explain what would happen with the revenue generated from this practice.
 - c. If FPUC has no plans to allow non-FPUC natural gas companies to utilize the facilities, please explain why not.

Company Response:

The Company will not allow non-FPUC natural gas companies to utilize the facilities at the Florida Safety Town, primarily to address legal ramifications. As a result, there is no estimated revenue from fees that would be charged.

Respondent: Jason Bennett

Interrogatory No. 30

30. Please refer to witness Bennet's testimony, Page 10, Line 21 through Page 13, Line 12.
- a. Please provide clarification as to what entities are considered safety responders, and if the terms "safety responders" and "first responders" are being used interchangeably.
 - b. Please explain if first responders will be charged a fee to utilize the Florida Safety Town. If so, please explain what would happen with the revenue generated from this practice.
 - c. Please explain if first responders are charged a fee to utilize the Delaware Safety Town.

Company Response:

The Company objects that portions of this interrogatory are vague, specifically the word "fee" can encompass a wide variety of costs and expenses. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such requests and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request.

- a. To clarify, the terms "safety responders" and "first responders" are being used interchangeably. They would include Emergency Medical Technicians (EMTs), paramedics, firefighters, and police officers.
- b. First responders would not be charged a fee to utilize the Florida Safety Town.
- c. First responders are not charged a fee to utilize the Delaware Safety Town.

Respondent: Jason Bennett

Interrogatory No. 31

31. Please refer to witness Bennet's testimony, Page 10, Line 21 through Page 13, Line 12. Please explain if FPUC has investigated the opportunity of using an alternative, such as Tampa Electric Company's gas safety training facilities, instead of constructing the Florida Safety Town. If not, please explain how the Company determined it was more cost-effective than the alternative(s), or if it was not more cost-effective, why it was selected. If not, please explain why the Company did not investigate any alternatives.

Company Response:

Yes, the Company investigated the opportunity of using an alternative, such as Tampa Electric Company's (TECO) gas safety training facilities, instead of constructing the Florida Safety Town. However, TECO's facilities are not open to non-company contractors or other utilities due to lack of classroom space, outdoor facility size, and legal ramifications.

There are no locally available training facilities where the Company could send employees for timely and cost-effective training. Employees would either need to be sent out of state for weeks at a time or enrolled in an apprenticeship program at a state college, and there would not be opportunity to train with local first responders.

Respondent: Jason Bennett

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for rate increase by Florida) Docket No. 20220067-GU
Public Utilities Company, Florida Division of)
Chesapeake Utilities Corporation, Florida)
Public Utilities – Fort Meade and Florida)
Public Utilities – Indiantown Division) Filed: August <u>29</u> , 2022
_____)

DECLARATION

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S FIFTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 29, 30 and 31 in Docket No. 20220067-GU. The responses are true and correct to the best of my knowledge.

Under the 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.



Jason Bennett, Declarant

Dated: 8/10/22