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# FPUC's Responses to Staff's Seventh Set of Interrogatories, Nos. 52-81

# (Including Attachments)

Interrogatory No. 52

INTERROGATORIES

52. Please refer to page 2, lines 7 through 10, of witness Moul's direct testimony.

a. Please explain what witness Moul defines as "supportive regulation."

b. Please list all infrastructure improvements and the estimated capital costs now underway for the company (excluding all projects recovered under the Company's Gas Reliability Investment Program).

**Company Response:**

a. Supportive regulation would provide the public utility with an enhanced ability to attract capital and render service to customers through a financial profile that would consist of expense and capital recovery provided by a regulatory commission in the ratesetting context that includes attractive returns to investors that commit capital to the public utility.

b. The Company objects that the phrase "infrastructure improvements" is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of this request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. A list of all the infrastructure improvements and the estimated capital costs now underway for the company (excluding all projects recovered under the Company's Gas Reliability Investment Program) is included in "Staff ROG 07-52 b 2022 Capital Spend Forecast".

***Respondent: Paul Moul & Jason Bennett***

Interrogatory No. 53

53. Please refer to page 4, lines 4 through 6, of witness Moul's direct testimony wherein witness Moul testifies that Chesapeake Utilities Corporation provides the Company with all of its required debt and equity capital. Under this scenario, does the Company believe a parent debt adjustment is required under Rule 25-14.004, Florida Administrative Code, Effect of Parent Debt on Federal Corporate Income Tax?

   a. If yes. Please provide the calculation to make the adjustment to income tax expense.

   b. If no. Please provide the Company' rationale for not making a parent debt adjustment.

**Company Response:**

No, FPUC is not a borrower under any third-party debt arrangement. Instead, CUC, the parent company of FPUC, maintains all the third-party debt. When filing a consolidated tax return of CUC and its subsidiaries (including FPUC), the tax deduction for interest expense is determined by the interest associated with the third-party debt held by the parent. As FPUC has no third-party debt, there is no tax deduction for interest expense recorded on the subsidiary's Federal income tax return. While FPUC has no debt on its books and records, an allocated portion of the parent's capital structure is applied to the rate base of FPUC as illustrated in MFR G-3 page 2. While Rule 25-14.004, F.A.C., contemplates an adjustment for parent company debt, the debt structure for Chesapeake Utilities and FPUC does not meet the intended fact pattern that the rule contemplates. However, the methodology used serves to achieve the intent of the rule since any income tax benefits resulting from the parent company debt are factored into FPUC's calculated costs. As a result, any additional parent debt adjustment would not be required to comply with Rule 25-14.004, F.A.C.

***Respondent: Mike Reno***

Interrogatory No. 54

54. Please refer to page 5, lines 16 through 20, of witness Moul's direct testimony. Please define how witness Moul "considered these events" and how the events impacted the inputs he used in various models of the cost of equity.

**Company Response:**

Mr. Moul considered forecasts of capital returns revealed by Blue Chip and Value Line included in his analysis. Moreover, the stock price data used by Mr. Moul included the early months of the market correction and the beginning of the upward move in interest rates.

***Respondent: Paul Moul***

Interrogatory No. 55

55. Please refer to page 6, lines 1 through 7, of witness Moul's direct testimony.

a. Please identify and provide a list of any interest and dividend payments FPUC is obligated to make for each year from 2023 through 2028.

b. Please quantify what witness Moul believes is a reasonable level of earnings retention for the Company.

c. Please quantify what witness Moul believes is an adequate level of internally generated funds for the Company.

d. Please explain what witness Moul believes are reasonable terms for the Company to raise capital.

**Company Response:**

a. FPUC is not required to make any interest and dividend payments from 2023 through 2028. FPUC does not publicly issue equity in the equity markets and is not a standalone borrower under any third-party debt arrangements. CUC, the parent company of FPUC, provides one-hundred percent of FPUC's investor capital, as needed. FPUC uses the capital received from CUC to invest in property, plant and equipment necessary to provide reliable service to its customers.

b. Earnings retention would be comprised of a fair return on equity, in this instance 11.25%, and a reasonable retention ratio, in the circumstance of CUC 60% (100% - 40%) based on historical experience. This would result in earnings retention of 6.75% (11.25% x .60) annually.

c. A reasonable range would be 50% to 65%.

d. Please refer to lines 1 through 7 of page 6 of Mr. Moul's prefiled direct testimony.

***Respondent: Paul Moul***

Interrogatory No. 56

56. Please refer to Exhibit No. PRM-1, Schedule 3, page 2 attached to witness Moul's direct testimony. Please explain the rationale for witness Moul's inclusion of Chesapeake Utilities Corporation (CUC) in his Gas Group even though he compares CUC to the Gas Group. Please explain why CUC would not be excluded from the Gas Group.

**Company Response:**

CUC meets all of the criteria listed on page 2 of Schedule 3 for membership in the Gas Group of proxy companies.

***Respondent: Paul Moul***

Interrogatory No. 57

57. Please refer to page 10, lines 1 through 11, of witness Moul's direct testimony.

a. Please explain how the Company is exposed to counterparty risk regarding hedging obligations.

b. Has witness Moul conducted any studies to quantify and compare the amount of investment the Company, CUC, or the companies in his Gas Group have made to enhance their cyber-security systems?

**Company Response:**

a. Hedging risk arises if a counterparty does not honor all of its obligations under a hedging arrangement.

b. The Company objects that the phrase "conducted any studies", including "studies" as a standalone term, the term "enhance" are vague, and the proposed comparison is vague. 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, and responds: No.

***Respondent: Paul Moul***

Interrogatory No. 58

58. Please refer to witness Noah Russel's direct testimony. On page 10, lines 1 through 2, witness Russel testifies that CUC's cyber coverage protects/indemnifies the Corporation from data breaches and other cyber security issues.

a. Has witness Moul considered the Company's cyber insurance coverage in his evaluation of cyber risk for the Company?

b. Does witness Moul agree that the cyber coverage would mitigate the business risk for the Company should it fall victim to a cyber-attack?

**Company Response:**

a. The Company objects that the term "considered" in this context is vague. 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, and states: No.

b. The Company objects that the terms "mitigate" and "business risk" are vague. 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. It could, depending upon the coverage available to the Company, limits on liability, and deductibles that the Company is required to retain.

***Respondent: Paul Moul***

Interrogatory No. 59

59. On page 10, line 19, and page 11, line 11, of witness Moul's direct testimony, the witness uses the acronym CUC for Chesapeake Utilities Corporation, FPUC's parent company.

a. To clarify, is witness Moul referring to the parent company or the regulated company, FPUC, in these references regarding natural gas deliveries?

b. If 74% of the total throughput of deliveries for the Company are to industrial customers, has witness Moul conducted any studies or evaluations of the industrial customers needs to determine if the industrial customers could in fact use alternative energy sources to power their operations?

**Company Response:**

a. In this context, it would mean the Central Florida Gas division of CUC, FPU, and FPU's Indiantown and Fort Meade divisions.

b. The Company objects that the phrases "studies and evaluations" and "use alternative energy sources to power their operations" are vague. 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, and states: No.

***Respondent: Paul Moul***

Interrogatory No. 60.

60. Please refer to page 12 of witness Moul's direct testimony. Beginning on line 1 and continuing through page 19, line 8, witness Moul explains his fundamental risk analysis for the Company wherein he compared CUC to the Gas Group and the S&P utilities. On page 19, lines 6 and 7, witness Moul states, "On balance, the risk factors average out, indicating that the cost of equity for the Gas Group provides a reasonable basis for measuring the Company's cost of equity."

a. Please explain why witness Moul did not include the Company, that is, FPUC and CFG in his fundamental risk analysis comparisons?

b. Please elaborate how witness Moul determined the profile of the Gas Group is comparable to the risk profile of the Company, that is, FPUC and CFG.

**Company Response:**

a. These units were not analyzed separately because CUC provides all the investor provided capital for all its divisions and subsidiaries (except the "equipment security note" applicable exclusively to Marlin Gas Services) and that investors do not view these units separately when providing capital to CUC.

b. Please refer to pages 12 through 19 of Mr. Moul's prefiled direct testimony.

***Respondent: Paul Moul***

Interrogatory No. 61

61. Please refer to page 23, lines 16 through 23, of Witness Moul's direct testimony.

a. If witness Moul selected a group of gas companies to serve as a proxy group to determine the cost of equity for FPUC, please explain the purpose of comparing the risk relationships among CUC, the Gas Group, and the S&P Public Utilities.

b. Did witness Moul perform any analysis comparing the other risk traits he mentions, such as differences in size, business diversification, geographical diversity, and regulatory policy between FPUC, the Gas Group, and the S&P Public Utilities?

**Company Response:**

a. It is necessary to analyze each of these groups individually to determine whether adjustments would be necessary for the group average data for application to FPUC. That is to say, if the analysis revealed a marked difference in risk traits, then an adjustment, upward or downward, may be required to the group average results.

b. The Company objects that the phrase "perform any analysis" is vague. 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. Yes. Please refer to pages 12 through 19 of Mr. Moul's prefiled direct testimony.

***Respondent: Paul Moul***

Interrogatory No. 62

62. Please refer to page 25, lines 17 through 21 of witness Moul's direct testimony.

a. If the DCF model requires the use of dividends per share to measure cash flows to investors, why did witness Moul not use forecasted dividends in one of his derivations of the DCF models to estimate the required return on equity for the Company?

b. Does witness Moul agree that forecasted dividends are available from Value Line?

**Company Response:**

a. Indirectly, he did. He accomplished this by creating a forward-looking specification of the dividend payments in the DCF model by the adjustment mechanism for the calculated dividend yields with the formulas presented in the lower panel of data shown on Schedule 7 of FPU Exhibit No. PRM-1 and described in footnote (7) on page 26 of Mr. Moul's prefiled direct testimony.

b. Yes.

***Respondent: Paul Moul***

Interrogatory No. 63

63. Please refer to page 26, lines 13 through 17 of witness Moul's direct testimony, and Exhibit No. PRM-1, Schedule 7 attached to witness Moul's direct testimony. Please show the calculations witness Moul used to derive the adjustments to the dividend yields for the ½ growth, Discrete, and Quarterly DCF model derivations in Schedule 7.

**Company Response:**

Please refer to the description provided in footnote (7) contained on page 26 of Mr. Moul's prefiled direct testimony, and the calculations shown on the lower panel of data on Schedule 7 of FPU Exhibit No. PRM-1.

***Respondent: Paul Moul***

Interrogatory No. 64

64. Please refer to page 27, lines 4 and 5 of witness Moul's direct testimony. Witness Moul states, "Future growth in earnings per share is the DCF model's primary focus . . . ." On page 29, lines 10 through 13, witness Moul testifies that, "Forecasts of earnings growth are required because the DCF model is forward looking, . . ."

a. Please explain in detail why witness Moul used historical growth rates from Value Line shown on Exhibit No. PRM-1, Schedule 8, to estimate the growth rate in the DCF model if the forward looking growth rate is required.

**Company Response:**

a. Historical growth rates were presented as a point of reference. Please refer to lines 13 through 20 of page 29 of Mr. Moul's prefiled direct testimony for further explanation.

***Respondent: Paul Moul***

Interrogatory No. 65

65. Please refer to page 27, lines 4 through 7 of witness Moul's direct testimony.

a. Please provide an academic text or recognized authoritative publication that supports witness Moul's assertion that "Future growth in earnings per share is the DCF model's primary focus because, under the model's assumption that the P-E multiple remains constant, the price per share of stock will grow at the same rate as earnings per share."

b. Does witness Moul agree that price volatility in the stock market causes fluctuations in the Price-to-Earnings multiple?

**Company Response:**

a. Please refer to Gordon, Gordon & Gould, "Choice Among Methods of Estimating Share Yield," The Journal of Portfolio Management (Spring 1989). A copy of this article was provided in response to Office of Public Counsel Request for PODs (Nos. 1-59), submitted on July 5, 2022, in POD 02, as "OPC POD 2 Choice Among Methods article.pdf."

b. Yes. That volatility is caused by a variety of factors, such as market sentiment, returns available on alternative investments, supply and demand for stocks, etc.

***Respondent: Paul Moul***

Interrogatory No. 66

66. Please refer to page 32, lines 19 through 22, and page 34, lines 19 through 21 of witness Moul's direct testimony. Please explain why witness Moul believes the DCF growth rate should never be established by a mathematical formula, but in contrast, witness Moul's leverage adjustment is developed through precise mathematical calculations.

**Company Response:**

That is because there is no definitive basis for developing a particular mathematical formula that encompasses all investor expectations of growth.

***Respondent: Paul Moul***

Interrogatory No. 67

67. Please refer to page 33, lines 3 and 4 of witness Moul's direct testimony.

a. Has witness Moul conducted any study or evaluation to quantify and compare the expected capital spending on infrastructure between the Company and the companies in his Gas Group?

b. If the answer is no, please explain why not.

**Company Response:**

a. The Company objects that the phrase "conducted any study or evaluation", and the term "infrastructure", are vague. 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, and responds: Yes.

b. See (a) above.

***Respondent: Paul Moul***

Interrogatory No. 68

68. Please refer to page 34, lines 1 through 4 of witness Moul's direct testimony.

a. Does witness Moul believe a leverage adjustment would be necessary if the Company's rate making capital structure did not include zero cost accumulated deferred income taxes and customer deposits?

b. Does witness Moul agree that the effect of zero cost accumulated deferred income taxes included in the rate making capital structure is a reduction to the overall rate of return used for setting rates?

c. Does witness Moul agree that the effect of increasing the cost of equity in the rate making capital structure through the use of the leverage adjustment negates the benefit to the customers of including the zero cost accumulated deferred income taxes in the rate making capital structure?

d. Does witness Moul agree that his leverage adjustment could be considered a return on the balance of accumulated deferred income taxes in the rate making capital structure?

**Company Response:**

a. Yes. Non-investor provided capital is traditionally handled through either (i) rate base deductions or (ii) through zero-cost capital treatment in the rate of return. Customer-provided capital is likewise handled through a rate base adjustment or through the rate of return. The outcome of either approach should be similar.

b. Yes.

c. No.

d. No.

***Respondent: Paul Moul***

Interrogatory No. 69

69. Please refer to page 36, lines 13 through 17 of witness Moul's direct testimony. Please explain when a leverage adjustment would be subtracted from the result of the simple DCF model.

**Company Response:**

That would occur when the equity ratio used for ratesetting purposes is greater than the market-value determined common equity ratio.

***Respondent: Paul Moul***

Interrogatory No. 70

70. Please refer to Exhibit No. PRM-1, Schedule 10 attached to witness Moul's direct testimony. Please provide the source(s) from which witness Moul obtained the company specific information in his table.

**Company Response:**

Those sources were generally the Form 10-K for each company in the Gas Group. Those values were taken from the relevant footnote that describes the "fair value" and "carrying value" of the debt for each company, the number of common shares outstanding, and the book value of the common equity account shown on the respective balance sheets. Stock prices were obtained from the internet. A copy of each company's Form 10-K is attached. Please refer to the following files:

Staff ROG 07-70 Atmos

Staff ROG 07-70 Chesapeake Utilities

Staff ROG 07-70 New Jersey Resource

Staff ROG 07-70 NiSource

Staff ROG 07-70 Northwest Natural

Staff ROG 07-70 One Gas Inc.

Staff ROG 07-70 Southwest Gas

Staff ROG 07-70 Spire, Inc.

***Respondent: Paul Moul***

Interrogatory No. 71

71. Please provide a list of all rate case proceedings in any jurisdiction in the United States in which witness Moul testified wherein his leverage adjustment was accepted as an appropriate adjustment to the simple DCF model result for use in determining the return on equity for a regulated utility.

**Company Response:**

Many of the cases where Mr. Moul proposed the leverage adjustment have been resolved by settlements that do not address the rate of return issue. The Pennsylvania Public Utility Commission set the equity return on the following cases that included a leverage adjustment.

- January 10, 2002 for Pennsylvania-American Water Company in Docket No. R-00016339 -- 60 basis points adjustment.
- August 1, 2002 for Philadelphia Suburban Water Company in Docket No. R-00016750 -- 80 basis points adjustment.
- January 29, 2004 for Pennsylvania-American Water Company in Docket No. R-00038304 (affirmed by the Commonwealth Court on November 8, 2004) -- 60 basis points adjustment.
- August 5, 2004 for Aqua Pennsylvania, Inc. in Docket No. R-00038805 -- 60 basis points adjustment.
- December 22, 2004 for PPL Electric Utilities Corporation in Docket No. R-00049255 -- 45 basis points.
- February 8, 2007 for PPL Gas Utilities Corporation in Docket No. R-00061398 -- 70 basis points adjustment

***Respondent: Paul Moul***

Interrogatory No. 72

72. Please refer to page 44, line 6 through page 45, line 6 of witness Moul's direct testimony.

a. Does witness Moul believe the Value Line Beta values for the companies in his Gas Group do not fully reflect the volatility of the companies' stocks compared with the overall stock market's volatility?

b. Does witness Moul believe that stock investors set the value of a company's stock based on book value rather than market value?

c. Please elaborate on witness Moul's understanding of what Beta means and how Value Line derives its Beta values for the companies in the Gas Group.

**Company Response:**

a. No.

b. No.

c. The Company objects that the terms "elaborate" is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. Mr. Moul used the betas that were published in Value Line for each company. Value Line is a source of the published betas that is relied upon by investors and is also the source generally employed with the CAPM methodology in determining returns on common equity in utility rate proceedings. Because the Value Line published betas are related solely to the market value of a company's equity, it is necessary to adjust those betas in a ratesetting context in order to position them for the book values that are used in the ratesetting context to calculate the weighted average cost of capital. So, while some adjustment has already been made by Value Line to account for regression bias, further adjustment is required to account for financial risk differences between market values and book values. The adjustment used here rests upon the Hamada formula to adjust solely for financial risk differences and do not overlap with the Value Line adjustment.

***Respondent: Paul Moul***

Interrogatory No. 73

73. Please refer to page 44, line 6 through page 45, line 6 of witness Moul's direct testimony. Please provide a list of all rate case proceedings in any jurisdiction in the United States in which witness Moul testified wherein his leveraged Beta adjustment for a book value capital structure was accepted and used to adjust the Beta value in the CAPM for use in determining the return on equity for a regulated utility for rate setting purposes.

**Company Response:**

Many of the cases where Mr. Moul proposed the leveraged Beta adjustment have been resolved by settlements. Mr. Moul is not aware of any.

***Respondent: Paul Moul***

Interrogatory No. 74

74. Please refer to Exhibit PRM-1, Schedule 14, page 2 of 3, attached to witness Moul's direct testimony.

   a. Please explain how witness Moul calculated the Median Appreciation Potential of 10.67 percent in his derivation of the Value Line Return. In the response, please include the calculations.

   b. Please explain how witness Moul determined the growth component of 13.7 percent in his DCF Result for the S&P 500 Composite. In the response, please include the calculations.

**Company Response:**

   a. $((1 + 0.50)^{.25} - 1)$. The Value Line report is attached. Please refer to the file titled "Staff ROG 07-74 a".

   b. Please refer to the document that is attached. Please refer to the file titled "Staff ROG 07-74 b".

***Respondent: Paul Moul***

Interrogatory No. 75

75. Please refer to Exhibit PRM-1, Schedule 14, page 3 of 3, attached to witness Moul's direct testimony.

a. In what decile category would witness Moul place the Gas Group?

b. From what source or publication did witness Moul obtain the Size-Decile Portfolios chart included in his exhibit?

c. Is witness Moul aware if a newer version of the table has been published that would have a period more recent than 1926-2016?

**Company Response:**

a. Third.

b. SBBI Yearbook, Stocks, Bonds, Bills and Inflation.

c. Mr. Moul believes that there is, but he does not have access to those data.

***Respondent: Paul Moul***

Interrogatory No. 76

76. Please refer to page 49, lines 26 through 28 of witness Moul's direct testimony. Does FPUC compete for capital in the financial marketplace with those companies identified in Exhibit No. PRM-1, Schedule 15, attached to witness Moul's direct testimony?

**Company Response:**

CUC, our parent company, does so on FPUC's behalf.

***Respondent: Paul Moul***

Interrogatory No. 77

77. Please refer page 50, lines 4 through 11 of witness Moul's direct testimony and Exhibit No. PRM-1, Schedule 15 page 2 of 3, attached to witness Moul's direct testimony.

a. Please explain how witness Moul determined the range of the rankings of the comparable companies in his Comparable Earnings Approach.

b. Please provide the rankings of the individual companies in his Gas Group.

**Company Response:**

a. The Company objects that the phrase "range of rankings" is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. The ranges were established by the rankings of the companies that compose the Gas Group.

b. Please refer to the Microsoft Excel spreadsheet that is attached titled "Staff ROG 07-77".

***Respondent: Paul Moul***

Interrogatory No. 78

78. Please refer to 50, lines 13 through 22 of witness Moul's direct testimony. Please define "returns" as used in witness Moul's Comparable Earnings Approach.

**Company Response:**

These were "Return on Shr. Equity" as published by Value Line.

***Respondent: Paul Moul***

Interrogatory No. 79

79. Please refer to Exhibit No. PRM-1, Schedule 15 page 2 of 3, attached to witness Moul's direct testimony.

a. Did witness Moul calculate the five-year average historical earned returns for the companies in his Gas Group and compare the results with those of is comparable companies?

b. If the answer is no, please explain why witness Moul did not.

**Company Response:**

a. Yes. For the Gas Group those returns were calculated separately and the group average is reported on page 1 of Schedule 3 of FPU Exhibit No. PRM-1. Individual company results were provided in response to Office of Public Counsel Request for PODs (Nos. 1-59), submitted on July 5, 2022, in POD 1; see "OPC POD 1 Index.pdf." .

b. Not applicable.

***Respondent: Paul Moul***

Interrogatory No. 80

80. Please refer to page 51, lines 16 through 18 of witness Moul's direct testimony.

What percentage of returns (return on equity) would witness Moul consider highly profitable and excessive for a regulated gas distribution utility?

**Company Response:**

The Company objects that the phrase "excessive" is vague. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. For Comparable Earnings purposes the breakpoint for being viewed as "highly profitable" was 20%. Please refer to lines 16 through 18 of page 51 of Mr. Moul's prefiled direct testimony.

***Respondent: Paul Moul***

Interrogatory No. 81

81. Please refer to page 52 of witness Moul's direct testimony. Does witness Moul believe that an allowed mid-point cost of equity of 10.75 percent for the Company in this rate case is reasonable and would satisfy the Hope and Bluefield standard?

**Company Response:**

The Company objects that the request is vague in this context as it may be misconstruing Mr. Moul's testimony, which did not provide 10.75% as a mid-point. FPUC has made a good-faith and reasonable attempt to ascertain the meaning of such request and provide a response based on such attempt, but FPUC responds without waiving its objection to the vagueness of the request. No. A return of 10.75% would be too low for the midpoint of the range. Rather, 10.75% would represent the low point of the range.

***Respondent: Paul Moul***

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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

**DECLARATION**

I hereby certify and affirm that I sponsored the Company's responses to STAFF'S SEVENTH SET OF INTERROGATORIES TO FLORIDA PUBLIC UTILITIES COMPANY, Nos. 52a and 54-81 in Docket No. 20220067-GU. 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.

Paul R. Moul

Paul Moul, Declarant

Dated: 09-21-2022