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April 2, 2025

VIA E-PORTAL

Mr. Adam Teitzman
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 20250017-EI – Review of 2026-2035 Storm Protection Plan, pursuant to Rule 25-6.030, F.A.C., Florida Public Utilities Company.

Dear Mr. Teitzman:

Attached for filing, please find the Rebuttal Testimony of P. Mark Cutshaw, submitted on behalf of Florida Public Utilities Company.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



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Before the Florida Public Service Commission

Rebuttal Testimony of P. Mark Cutshaw

On Behalf of

Florida Public Utilities Company

Docket 20250017-EI

1

2 **I. Background**

3 **Q. Please state your name and business address.**

4 **A.** My name is P. Mark Cutshaw. My business address is 780 Amelia Island Parkway,
5 Fernandina Beach, Florida 32034.

6 **Q. By whom are you employed?**

7 **A.** I am employed by Florida Public Utilities Company (“FPUC” or “Company”).

8 **Q. Have you previously filed direct testimony in this docket?**

9 **A.** Yes, I filed direct testimony on behalf of Florida Public Utilities Company (“FPUC”
10 or “Company”).

11 **Q. Are you sponsoring any exhibits with your rebuttal testimony?**

12 **A.** Not at this time.

13 **II. Purpose**

14 **Q. What is the purpose of your rebuttal testimony?**

15 **A.** The purpose of my testimony is to rebut various conclusions contained in the direct
16 testimony of the Office of Public Counsel’s (“OPC”) witness Kevin Mara pertaining
17 to his analysis of FPUC’s updated Storm Protection Plan (“SPP”) and particularly, the
18 proposed Distribution Connectivity and Automation Plan. I will also briefly address

1 Mr. Mara's comments regarding the changes to the budget for the overhead feeder
2 hardening program.

3 **III. Responses**

4 **Q. Is Mr. Mara correct that FPUC "does not have a set of written planning criteria**
5 **for their distribution system?"¹**

6 A. No. That is not correct. Mr. Mara appears to misconstrue FPUC's response to the
7 Office of Public Counsel's ("OPC") Interrogatory 10a. As stated in response to
8 Interrogatory 10a, although "FPUC does not have any documented distribution
9 planning criteria", there are other written criteria that are utilized when developing
10 distribution and transmission projects. Primarily, the National Electric Safety Code
11 (NESC) is utilized when project planning and design occurs. The NESC includes
12 many written details including crucial requirements that must be considered. As
13 situations require more detailed planning and engineering, consultants and other
14 software resources are used for situations such as distribution pole loading,
15 transmission pole design, conductor sag calculations, etc. Being that the FPUC
16 system is comprised of less than 34,000 customers, across two geographically
17 separated small service territories, extensive planning criteria are not necessary to
18 ensure that voltage, thermal and contingency limitations are adhered within both the
19 planning and operation of the system. Rather than having remote personnel
20 performing planning activities, FPUC has experienced engineering and operations
21 staff out in the field on a consistent basis ensuring the system planning and operational
22 criteria complies with standard utility practice.

¹ Direct Testimony of Kevin J. Mara, p.9, lines 16-20.

1 **Q. Does Witness Mara have a complete understanding of FPUC’s proposed new**
2 **program, the Distribution Connectivity and Automation Program (or “DCA**
3 **Program”)?**

4 A. No. Witness Mara makes several incorrect assumptions regarding the proposed
5 Program and the FPUC system. For instance, his comparison of our distribution
6 program to a transmission program, his suggestion that the program’s scope is
7 incomplete, and his assertion that FPUC’s system has intertie capabilities that do not
8 exist, as well as his seeming misapplication of one of the Plan filing requirements,
9 indicate a misunderstanding of both what FPUC was required to file and what it is
10 proposing to do.² I address each of these in more detail below.

11 **Q. Is Witness Mara correct in stating that, “FPUC does not yet know the number of**
12 **automated devices to be installed nor the details of the communications”?**³

13 A. No, he is not. Likewise, his comment that “FPUC has not developed the concept of
14 the Program enough to describe the communication of the automation system nor the
15 number or type of devices to be used” is also not accurate.⁴ The installation of devices
16 and their integrated communication system is outside the 3-year detailed planning
17 period; thus, specific numbers and quantities were not included in the filing. However,
18 this technology and communication system is well-documented, and supported by case
19 studies by several U.S. and Canadian utilities, including one large Florida-based
20 utility. The technology the FPUC is proposing to implement is not new; instead, it has

² Direct Testimony of Kevin J. Mara, at pages 11, 10, 11, and 12.

³ Direct Testimony of Kevin J. Mara, p.10, lines 14-15.

⁴ Direct Testimony of Kevin J. Mara, p.11, lines 28-30.

1 been well studied, documented and successfully deployed. FPUC provided articles
2 with these details as part of our response to Staff's first Interrogatory.

3 **Q. Is his statement that all "feasible and practical" feeder connections have already**
4 **been made, correct?**⁵

5 A. No. As reflected in the discovery response cited by Witness Mara, FPUC indicated
6 that feeder ties had been made when feasible and practical but did not indicate that all
7 feasible and practical feeder connections have already been established. The
8 referenced feeder ties have been established over time as part of a multitude of new
9 service connection projects when the opportunities presented itself. In other words,
10 prior to the proposed DCA Program, FPUC had no program specifically geared at
11 establishing feeder ties. However, in order to mitigate restoration costs and outage
12 times for our customers, as contemplated by the Legislature, we have determined that
13 the reasonable and feasible way to address that issue is through the DCA Program,
14 which begins with identifying and constructing other tie points.

15
16 **Q. Is the Distribution Connectivity and Automation Program identical to Duke's**
17 **Transmission LFRS program?**⁶

18 A. No. The referenced Duke Transmission LFRS Program, as I understand it, is not
19 identical nor similar to the FPUC Distribution Connectivity and Automation Program.
20 FPUC's program is more similar to Duke Energy's Self-Optimizing Grid Program,
21 which contains similar distribution system strengthening enhancements as FPUC's
22 proposed program.

⁵ Direct Testimony of Kevin J. Mara, p.11, lines 27-28.

⁶ Direct Testimony of Kevin J. Mara, p.11, lines 7-24.

1 **Q. Did FPUC comply with Rule 25-6.030(3)(c), F.S., as it pertains to the Distribution**
2 **Connectivity and Automation Program?**⁷

3 A. Yes. The maps and description of customers served, as required by the referenced
4 Rule, can be found in pages 10 through 13 of FPUC's Plan, which is my exhibit PMC-
5 01. It appears that Mr. Mara reads this paragraph of the rule to apply to individual
6 programs. While I am not a lawyer, I read that particular paragraph to apply to the
7 overall Plan, not individual programs. Furthermore, the Distribution Connectivity and
8 Automation Program, like all other Programs FPUC proposed, is applicable across the
9 entirety of FPUC's service territory. That is, FPUC has not identified any areas within
10 its service territory where enhancement of the existing transmission and distribution
11 facilities would not be feasible, reasonable, or practical.

12 **Q. Does the program harden existing facilities, or instead, simply construct new,**
13 **redundant infrastructure?**⁸

14 A. I believe the former is more accurate. This program will enable hardened overhead
15 feeders, overhead laterals and underground laterals the ability to maintain service
16 when extreme weather conditions or accidents impact an area. This is achieved in
17 different ways, some of which involve reconductoring existing facilities so that they
18 have the adequate capacity for two-way power flow, extending an existing line to
19 create new tie point to another existing line, segmenting the feeder to allow for the
20 rerouting of power, and installing automated devices to detect faults, isolate areas of
21 damage, and automatically reroute power to the unaffected areas of the grid.

⁷ Direct Testimony of Kevin J. Mara, p.12, lines 1-3.

⁸ Direct Testimony of Kevin J. Mara, p.11, lines 18-24.

1 **Q. Mr. Mara indicated that FPUC's Overhead Feeder Hardening budget increased**
2 **for the three-year horizon (2026-2028) relative to same three-year horizon budget**
3 **presented in 2022.⁹ Is that accurate?**

4 A. Yes. The numbers described by Witness Mara are correct.

5 **Q. Was the increase expected?**

6 A. Due to some uncertainties and our lack of experience with our initial Storm Protection
7 Plan in general, we had a reasonable expectation that costs would likely increase as
8 we gained experience and honed the details of our Plan. Specifically, FPUC's initial
9 SPP reflected the best projections known to us at that time. However, when we
10 developed our first Plan to be filed in 2022, we had a level of uncertainty around
11 several things, including how to appropriately manage the plan and how to handle
12 supply chain issues, among other things. Our goal was to develop a plan that was
13 manageable, but met the Rule requirements, and then make reasonable and practical
14 adjustments as we gained experience. With experience, we learned that adjustments
15 to the undergrounding criteria were necessary, as noted in our filing, and we
16 incorporated the lessons we learned during the first 3 years of implementation into the
17 adjustments we incorporated in our updated Plan.

18 **Q. Witness Mara also indicates that the Overhead Feeder Hardening program**
19 **originally had a "slow roll-out" but that now it is on track to be completed in 10**
20 **years.¹⁰ Is that accurate?**

21 A. Witness Mara is partially correct. Like all of the programs in FPUC's initial SPP, the
22 Overhead Feeder Hardening Program was contemplated to ramp up slowly in terms of

⁹ Direct Testimony of Kevin J. Mara, p.6, lines 5-11.

¹⁰ Direct Testimony of Kevin J. Mara, p.6, lines 8-9.

1 activity and, therefore, costs. In our initial SPP, this program was planned as a 30-year
2 program. Due to our experience in implementing this program, we refined our
3 projection to reflect completion in 20 years from the filing of this updated SPP, or 24
4 years total based upon the initial start date. Witness Mara's is not correct that it will
5 be completed in 10 years.

6 **Q. Does this conclude your testimony?**

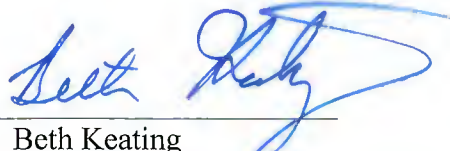
7 **A.** Yes, it does.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Rebuttal Testimony of P. Mark Cutshaw has been furnished by Electronic Mail to the following parties of record this 2nd day of April, 2025:

Office of Public Counsel Walter Trierweiler/Charles Rehwinkel c/o The Florida Legislature 111 West Madison Street, Room 812 Tallahassee, FL 32399-1400 Trierweiler.Walt@leg.state.fl.us Rehwinkel.Charles@leg.state.fl.us Christensen.Patty@leg.state.fl.us Wessling.Mary@leg.state.fl.us Ponce.Octavio@leg.state.fl.us Watrous.Austin@leg.state.fl.us	Michelle D. Napier Director, Regulatory Affairs Distribution Florida Public Utilities Company 1635 Meathe Drive West Palm Beach, Florida 33411 W: (561) 838-1712 mnapier@fpuc.com Mike Cassel Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 mcassel@fpuc.com
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