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October 6, 2025

VIA E-PORTAL

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

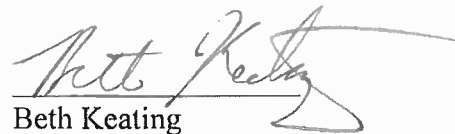
Re: Docket No. 20250109-GU: Petition for approval of gas utility access and replacement directive cost recovery factors for January 2026 through December 2026, by Florida Public Utilities Company

Dear Mr. Teitzman:

Attached for filing, please find Florida Public Utilities Company's Responses to Staff's First Set of Data Requests.

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,



Beth Keating
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MEK

Cc:// Office of the General Counsel (Dose)
Division of Economics (Guffey)

Florida Public Utilities Company's Responses to Staff's First Set of Data Requests

- 1) Referring to paragraph 8 of the petition filed on September 2, 2025, please explain why the Company was unable to provide seven months of actual data in the current petition when the 2024 GUARD petition filed on September 3, 2024 contained seven months of actual data.

Company Response:

The Company filed actual/estimated amounts based upon 6 months of actual data and 6 months of projected data to align with the Company's sister company, Florida City Gas, SAFE program filing. This will enable the Company to provide the most accurate data and providing time to carefully review the filings, hence reducing the risks of errors. Also, any differences between actual and estimated July, will be incorporated in the next years rates. Therefore, the Company would respectfully ask the Commission to consider allowing the filing all future GUARD filing using 6 months of actual data.

- 2) Regarding the six months of actual and six months of projected data provided in the current petition, please state if this change is only for the 2025 filing or if the future GUARD filings will also contain six months actual and six months projected data.

Company Response:

Please see response to Question 1 above.

- 3) Paragraph 9 of the petition states that the "total projected GUARD true-up to be refunded to customers in 2026 is a net under-recovery of \$42,599, inclusive of interest" while the testimony of witness Dayton on page 3 of 5 states that the "total net under-recovery to be collected for FPUC is \$42,599."

Company Response:

The petition is inadvertently stated 'refunded' when it should have stated 'collected'. The total projected GUARD true-up is a net under-recovery of \$42,599 to be collected in 2026.

- 4) Referring to Schedule F-1 (Exhibit BD-1), lines 36 and 37 of the Excel file, please explain why Sanford Phase 1 and Winter Springs Phase 2 completed in quarters 2 and 4 of 2024 are listed as being “in progress”.

Company Response:

Sanford Phase 1 and Winter Springs Phase 2 are projects that have been completed they should have been noted as completed on Schedule F-1.

- 5) With reference to FPUC witness Dayton’s testimony on page 4 of 5, lines 1-2, please provide a detailed discussion how FPUC prioritizes its replacement projects and ensures that they are completed in a cost-effective manner.

Company Response

FPUC prioritizes its replacement projects based on a risk assessment, labeled as high, medium and low risk. This program prioritizes all high-risk areas and consults with a team of subject matter experts to determine which of the high-risk projects will be completed first. To complete all projects in a cost-effective manner, we use a competitive bidding process. Work is awarded based on lowest bid, capacity to complete the work and historical performance.

- 6) If the Company relies on the DIMP plan, please provide any relevant pages from the DIMP plan that support the replacement projects planned for 2026.

Company Response

The DIMP plan establishes priority criteria based on risk areas reviewed annually that combines FPUC Subject Matter Expert's knowledge and feedback, and the risk assessment noted in response to Question 5 above. Please see attached the pages from the DIMP plan which addresses the Risk Evaluation.

- 7) Please provide a discussion on whether the FPUC uses in-house or contract labor to complete the replacement projects and what criteria that decision is based on.

Company Response

FPUC utilizes contracted labor to complete the replacement projects due to limited internal resources.

- 8) If FPUC uses contract labor, please discuss controls to ensure the payments for contract labor are reasonable.

Company Response

The labor contracts for the replacement work are competitively bid and are awarded based on lowest bid, capacity to complete the work and historical performance. Invoices are reviewed by the project management staff for accuracy.

- 9) Please provide a discussion how FPUC purchases the replacement materials and ensures that they are purchased in a cost-effective manner.

Company Response

For each project a bill of material is created and before the project starts the construction team orders the materials. FPUC utilizes the vendor that provides fair pricing and material availability.