

State of Florida



Public Service Commission

CAPITAL CIRCLE OFFICE CENTER • 2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0850

-M-E-M-O-R-A-N-D-U-M-

DATE: July 17, 2008
TO: Daniel Q. Lee, Engineering Specialist IV, Division of Economic Regulation
FROM: Denise N. Vandiver, Chief of Auditing, Division of Regulatory Compliance & Consumer Assistance
RE: **Docket No: 080004-GU; Company Name: Florida Public Utilities Co.;**
Audit Purpose: Gas Energy Conservation Clause; Company Code: GU603;
Record # 5778; Audit Control No: 08-037-4-4:

Attached is the final audit report for the utility stated above. I am sending the utility a copy of this memo and the audit report. If the utility desires to file a response to the audit report, it should send the response to the Division of Commission Clerk. There are no confidential work papers associated with this audit.

DNV:sbj
Attachments

Copy: Division of Regulatory Compliance and Consumer
Assistance (Hoppe, District Offices, File Folder -6)
Division of Commission Clerk (2)
Division of Competitive Markets and Enforcement (Harvey)
General Counsel
Office of Public Counsel

Mr. Mehrdad Khojasteh
Florida Public Utilities Company
P.O. Box 3395
West Palm Beach, FL 33402-3395

Norman H. Horton, Jr.
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FLORIDA PUBLIC SERVICE COMMISSION

***DIVISION OF REGULATORY COMPLIANCE AND
CONSUMER ASSISTANCE
BUREAU OF AUDITING***

Miami District Office

**Florida Public Utilities Company
Gas Energy Conservation Clause Audit**

Twelve Months Ended December 31, 2007

**DOCKET #080004-GU
AUDIT CONTROL NO. 08-037-4-4**

A handwritten signature in cursive script, reading "Kathy L. Welch".

***Kathy L. Welch
Audit Manager***

A handwritten signature in cursive script, reading "Iliana Piedra".

***Iliana Piedra
Regulatory Analyst***

DOCUMENT NUMBER-DATE

06187 JUL 17 8

FPSC-COMMISSION CLERK

TABLE OF CONTENTS

AUDITOR'S REPORT	PAGE
I. PURPOSE	1
II. OBJECTIVES AND PROCEDURES	2
III. DETAIL OF FINDINGS	3
1. Demo Kitchen	3
2. Car Wrap	4
3. Entertainment and Spouse Expense	6
4. Interest Rates	7
IV. EXHIBITS	9
Company Filing Calculation of True-up for 2007	

DOCUMENT NUMBER - DATE
06187 JUL 17 8
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**DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE
AUDITOR'S REPORT**

July 3, 2008

**TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED
PARTIES**

We have performed the procedures enumerated later in this report to meet the agreed upon objectives set forth by the Division of Economic Regulation in its audit service request. We have applied these procedures to the attached schedules, prepared by Florida Public Utilities Company, in support of its filing for conservation docket 080004-GU.

This audit is performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use.

OBJECTIVES AND PROCEDURES:

Objective: The objective of the audit was to reconcile the schedules to each other and to the general ledger.

Procedures: We prepared a trial balance using the general ledger and reconciled all conservation accounts to the filing.

Objective: The objective was to verify that the true-up was calculated correctly.

Procedures: We agreed the beginning true-up provision to the last order and workpapers. We prepared a recalculation using the filing and Commission approved interest rates. Audit finding four discusses the company use of the incorrect interest rates.

Objective: The objective of the audit was to determine that the company has applied the approved conservation cost recovery factors to actual therm sales and properly calculated revenues.

Procedures: Therms from the statistics report were multiplied by the ordered rates and compared to the ledger and filing. Differences were compared to billing corrections. Some bills were selected and recalculated to determine that the tariff rates were used.

Objective: The objective of the audit was to determine that the actual energy conservation program expenses filed by the company agree with source documentation and meet the requirements of the programs.

Procedures: We reconciled the filing to the general ledger detail. We selected a sample of the vouchers recorded in the general ledger and traced them to source documentation. Audit finding one discusses the demo kitchen. Audit finding two discusses the car wrap. Audit finding three discusses entertainment and spouse expense.

We verified that the incentives paid by voucher met the program guidelines.

We reconciled the payroll taxes on the payroll file to the support in the last audit. We reviewed the ledger to determine that all the corrections from the last audit were made. We reviewed the payroll file for new employees and obtained their job titles to determine if they were conservation employees.

AUDIT FINDING NO. 1

SUBJECT: DEMO KITCHEN

AUDIT ANALYSIS: An invoice paid to Relwood Installation Corp in September 2007 for \$6,250 was for a demo kitchen. It was charged to account 121.4010.909 – West Palm Advertising expense. The kitchen is in the front of the gas appliance showroom in the West Palm Beach office building and appears to be part of the appliance sales display.

According to the company strategy brief, "the Energy Star kitchen contributes to conservation by promoting efficient use of energy efficient appliances. The kitchen creates an educational environment to engage customers in exploring the various features of an appliance that make the appliance more energy and/or resource efficient. One of the major myths of energy efficiency is that energy efficient products sacrifice looks and performance to achieve efficiency. The high end look of the kitchen and appliances demonstrate that energy efficiency and style are not mutually exclusive."

The kitchen also benefits appliance sales and may be more appropriately recorded below the line.

EFFECT ON GENERAL LEDGER: This finding is reported for informational purposes.

EFFECT ON FILING: This finding is reported for informational purposes.

AUDIT FINDING NO. 2

SUBJECT: CAR WRAP

AUDIT ANALYSIS: Florida Public Utilities paid \$6,549.75 to Signs for Tomorrow for a car wrap around two Chevy Trucks used in the electric divisions. The wrap advertises the conservation programs. The invoice was charged 46% to gas and 54% to electric divisions. According to a company representative the costs should be 100% electric.

EFFECT ON GENERAL LEDGER: The following entry should be made to the ledger but not included in next years filing costs:

114.4010.909-Marianna Conservation Advertising	\$1,506.45	\$
115.4010.909-Fernandina Conservation Advertising	1,506.44	
121.4010.909 West Palm Cons. Advertising		1,506.45
123.4010.909 Brevard Conservation Advertising		1,506.45

EFFECT ON FILING: Gas costs should be decreased by \$3,012.89 and interest of \$112 for a total increase to the over-recovery of \$3,125.

INTEREST RATES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
	Beginning	5.270%	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%
Ending	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%	4.980%
Total	10.530%	10.520%	10.520%	10.520%	10.520%	10.540%	10.520%	10.860%	10.670%	9.770%	9.470%	9.730%
Average	5.265%	5.260%	5.260%	5.260%	5.260%	5.270%	5.260%	5.430%	5.335%	4.885%	4.735%	4.865%
Monthly Average	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%

CALCULATION OF TRUE-UP

	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
Total Conservation Revenues (line 3)	-267,869	-266,849	-279,499	-224,468	-186,362	-174,986	-153,697	-140,256	-131,577	-156,351	-181,929	-217,637	-2,381,480
(1/12) of Prior True-Up (4) (A)	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-268,309
Total conservation revenue current period	-290,228	-289,208	-301,858	-246,827	-208,721	-197,345	-176,056	-162,615	-153,936	-178,710	-204,288	-239,996	0
Conservation Cost	91,710	119,118	194,559	292,256	155,055	282,718	137,117	198,498	194,416	254,227	176,034	150,852	2,246,560
True-up this period	-198,518	-170,090	-107,299	45,429	-53,666	85,373	-38,939	35,883	40,480	75,517	-28,254	-89,144	-403,229
Interest provision (line 8)	-1,564	-2,279	-2,799	-2,849	-2,781	-2,631	-2,438	-2,433	-2,132	-1,634	-1,409	-1,601	-26,549
Adj. to interest prov. (a)	0	0	0	0	0	0	0	0	0	0	0	0	0
Deferred true-up beginning (9a)	0	0	0	0	0	0	0	0	0	0	0	0	0
True-up & interest beginning (9) (A)	-268,309	-446,032	-596,042	-683,780	-618,841	-652,929	-547,828	-566,846	-511,037	-450,330	-354,088	-361,392	-268,309
Regulatory assea. fee adj (9b)	0	0	0	0	0	0	0	0	0	0	0	0	0
Prior true-up collected ref. (10) (A)	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	268,309
Total net true-up over-recovery (under)	-446,032	-596,042	-683,780	-618,841	-652,929	-547,828	-566,846	-511,037	-450,330	-354,088	-361,392	-429,777	-429,777
True-up for the month per filing	-445,776	-595,464	-682,879	-614,706	-648,632	-543,453	-562,480	-506,600	-445,846	-349,711	-357,153	-425,650	-425,650
Difference is due to rounding	-256	-578	-901	-4,135	-4,297	-4,375	-4,366	-4,437	-4,484	-4,377	-4,239	-4,127	-4,127

CALCULATION OF INTEREST

													Interest adjustment	-1,004
Beginning true up and interest	-268,309	-446,032	-596,042	-683,780	-618,841	-652,929	-547,828	-566,846	-511,037	-450,330	-354,088	-361,392	Correction for this finding	-3,123
Ending true-up before int	-444,468	-593,763	-680,982	-615,992	-650,148	-545,197	-564,408	-508,604	-448,198	-352,454	-359,983	-428,177		
Total	-712,777	-1,039,794	-1,277,023	-1,299,773	-1,268,989	-1,198,126	-1,112,236	-1,075,449	-959,235	-802,784	-714,071	-789,569		
Average true up	-356,389	-519,897	-638,512	-649,886	-634,494	-599,063	-556,118	-537,725	-479,617	-401,392	-357,036	-394,784		
Interest rate per above	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%		
Interest per staff	-1,564	-2,279	-2,799	-2,849	-2,781	-2,631	-2,438	-2,433	-2,132	-1,634	-1,409	-1,601	-26,549	
Interest per filing	-1,308	-1,957	-2,475	-2,628	-2,619	-2,553	-2,448	-2,362	-2,085	-1,741	-1,545	-1,712	-25,433	
Difference is due to rounding	-256	-322	-324	-221	-162	-78	10	-71	-47	107	136	111	-1,116	
													Interest Correction	-1,004
													Correction this finding	-112

AUDIT FINDING NO. 3

SUBJECT: ENTERTAINMENT AND SPOUSE EXPENSES

AUDIT ANALYSIS: A company employee was reimbursed for expenses for a Builder Development Conference in Bonita Beach in May of 2007. The expense included entertainment costs of \$1,011.96 for employees and a builder and his wife. These costs were charged to account 121.4010.907-West Palm Beach Supervision expenses.

In June 2007, \$1,875 was paid to the SGA Builders and Developers Conference for registration for spouses and an Eco Tour for both the spouses and the participants. One of the registrations paid was for a developer and his wife.

According to the utility representative, "spouses of the builders and developers are invited and are encouraged to participate in all meetings, social events and educational seminars. The thought process behind inviting the spouses is based on the theory that if you convince the spouse, they too will encourage the use of natural gas and will want to attend future events. It is vital that the industry reach out to and educate the decision makers that will impact future expansion of natural gas."

"To balance out the networking and social interaction, FPU and other participating companies invite their spouses as well to attend and to assist with the marketing of natural gas and the conservation programs under which we provide incentives in the form of rebates and services."

EFFECT ON GENERAL LEDGER: This finding is reported for informational purposes.

EFFECT ON FILING: This finding is reported for informational purposes.

AUDIT FINDING NO. 4

SUBJECT: INTEREST RATES

AUDIT ANALYSIS: Florida Public Utilities did not use the correct Wall Street Journal Interest Rates. This error resulted in an understatement of the over-recovery of \$1,004. The attached schedule details the difference with the new rates.

EFFECT ON GENERAL LEDGER: The true up account needs to be credited with the \$1,004 of interest.

EFFECT ON FILING: Interest expense should be decreased by \$1,004.

INTEREST RATES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER
Beginning	5.270%	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%
Ending	5.260%	5.260%	5.260%	5.260%	5.260%	5.280%	5.240%	5.620%	5.050%	4.720%	4.750%	4.980%
Total	10.530%	10.520%	10.520%	10.520%	10.520%	10.540%	10.520%	10.860%	10.670%	9.770%	9.470%	9.730%
Average	5.265%	5.260%	5.260%	5.260%	5.260%	5.270%	5.260%	5.430%	5.335%	4.885%	4.735%	4.865%
Monthly Average	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%

CALCULATION OF TRUE-UP	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
Total Conservation Revenues (line 3)	-267,869	-266,849	-279,499	-224,468	-186,362	-174,986	-153,697	-140,256	-131,577	-156,351	-181,929	-217,637	-2,381,480
(1/12) of Prior True-Up (4) (A)	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-22,359	-268,309
Total conservation revenue current period	-290,228	-289,208	-301,858	-246,827	-208,721	-197,345	-176,056	-162,615	-153,936	-178,710	-204,288	-239,996	-2,649,789
Conservation Cost	91,710	119,118	194,559	295,269	155,055	282,718	137,117	198,498	194,416	254,227	176,034	150,852	2,249,573
True-up this period	-198,518	-170,090	-107,299	48,442	-53,666	85,373	-38,939	35,883	40,480	75,517	-28,254	-89,144	-400,216
Interest provision (line 8)	-1,564	-2,279	-2,799	-2,842	-2,768	-2,618	-2,424	-2,419	-2,119	-1,621	-1,397	-1,588	-26,437
Adj. to interest prov. (a)	0	0	0	0	0	0	0	0	0	0	0	0	0
Deferred true-up beginning (9a)	0	0	0	0	0	0	0	0	0	0	0	0	0
True-up & interest beginning (9) (A)	-268,309	-446,032	-596,042	-683,780	-615,821	-649,896	-544,782	-563,786	-507,964	-447,243	-350,989	-358,280	-268,309
Regulatory asses. fee adj (9b)	0	0	0	0	0	0	0	0	0	0	0	0	0
Prior true-up collected ref. (10) (A)	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	268,309
Total net true-up over-recovery (under)	-446,032	-596,042	-683,780	-615,821	-649,896	-544,782	-563,786	-507,964	-447,243	-350,989	-358,280	-426,653	-426,653
True-up for the month per filing	-445,776	-595,464	-682,879	-614,706	-648,632	-543,453	-562,480	-506,600	-445,846	-349,711	-357,153	-425,650	-425,650
Difference is due to rounding	-256	-578	-901	-1,115	-1,264	-1,329	-1,306	-1,364	-1,397	-1,278	-1,127	-1,003	-1,003
CALCULATION OF INTEREST													
Beginning true up and interest	-268,309	-446,032	-596,042	-683,780	-615,821	-649,896	-544,782	-563,786	-507,964	-447,243	-350,989	-358,280	
Ending true-up before int	-444,468	-593,763	-680,982	-612,979	-647,128	-542,164	-561,362	-505,544	-445,125	-349,367	-356,884	-425,065	
Total	-712,777	-1,039,794	-1,277,023	-1,296,760	-1,262,950	-1,192,061	-1,106,144	-1,069,330	-953,088	-796,610	-707,872	-783,345	
Average true up	-356,389	-519,897	-638,512	-648,380	-631,475	-596,030	-553,072	-534,665	-476,544	-398,305	-353,936	-391,673	
Interest rate per above	0.439%	0.438%	0.438%	0.438%	0.438%	0.439%	0.438%	0.453%	0.445%	0.407%	0.395%	0.405%	
Interest per staff	-1,584	-2,279	-2,799	-2,842	-2,768	-2,618	-2,424	-2,419	-2,119	-1,621	-1,397	-1,588	-26,437
Interest per filing	-1,306	-1,957	-2,475	-2,628	-2,619	-2,553	-2,448	-2,362	-2,085	-1,741	-1,545	-1,712	-25,433
Difference is due to rounding	-256	-322	-324	-214	-149	-65	24	-57	-34	120	148	124	-1,004

EXHIBITS

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY

SCHEDULE CT-3
PAGE 1 OF 3

ENERGY CONSERVATION ADJUSTMENT CALCULATION OF TRUE-UP AND INTEREST PROVISION
SUMMARY OF EXPENSES BY PROGRAM BY MONTH

FOR MONTHS January-07 THROUGH December-07

A. CONSERVATION EXPENSE BY PROGRAM		JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1.	Full House Residential New Construction Program	16,847	19,864	20,988	80,995	6,435	28,781	14,955	19,284	12,995	20,146	10,232	38,993	290,495
2.	Residential Appliance Replacement Program	13,706	16,685	67,492	98,305	79,800	105,833	43,101	84,087	26,285	63,151	36,979	23,288	658,712
3.	Conservation Education Program	778	1,482	1,027	42,218	476	2,067	2,716	3,460	165	2,308	639	208	57,544
4.	Space Conditioning Program	550	(25)	568	477	671	4,959	806	736	715	740	643	650	11,491
5.	Residential Conservation Service Program	447	1,102	1,050	1,958	1,973	1,690	1,409	9,773	27,452	669	2,545	707	50,771
6.	Residential Appliance Retention Program	27,830	40,588	61,989	28,365	25,321	45,787	26,662	33,782	36,064	99,150	79,582	39,684	544,753
7.	Dealer / Contractor		0											0
10.	Commercial Conservation Service Program	755	7,294	4,022	1,326	350	6,217	1,149	6,658	30,629	(350)	1,493	372	59,915
12.	Residential Service Reactivation Program		40			459	560	829	(50)	16,494	17,806			35,938
14.	Common	30,797	32,118	37,424	41,626	39,571	86,863	45,690	40,770	43,617	50,607	43,920	46,950	539,954
15.														
16.														
17.														
18.														
19.														
20.														
21.	TOTAL ALL PROGRAMS	91,710	119,118	194,559	295,269	155,055	282,718	137,117	198,498	194,416	254,227	176,034	150,852	2,249,573
22.	LESS AMOUNT INCLUDED IN RATE BASE													
23.	RECOVERABLE CONSERVATION EXPENSES	91,710	119,118	194,559	295,269	155,055	282,718	137,117	198,498	194,416	254,227	176,034	150,852	2,249,573

EXHIBIT NO. _____
DOCKET NO. 080004-GU
FLORIDA PUBLIC UTILITIES COMPANY
(MSS-1)
PAGE 5 OF 18

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-07 THROUGH December-07

SCHEDULE CT-3
PAGE 2 OF 3

B. CONSERVATION REVENUES	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1. RESIDENTIAL CONSERVATION													
2. CONSERVATION ADJ. REVENUES	(267,869)	(266,849)	(279,499)	(224,468)	(186,362)	(174,986)	(153,697)	(140,256)	(131,577)	(156,351)	(181,929)	(217,637)	(2,381,480)
3. TOTAL REVENUES	(267,869)	(266,849)	(279,499)	(224,468)	(186,362)	(174,986)	(153,697)	(140,256)	(131,577)	(156,351)	(181,929)	(217,637)	(2,381,480)
4. PRIOR PERIOD TRUE-UP ADJ. NOT APPLICABLE TO THIS PERIOD	(22,360)	(22,359)	(22,359)	(22,359)	(22,359)	(22,369)	(22,359)	(22,359)	(22,359)	(22,359)	(22,359)	(22,359)	(268,309)
5. CONSERVATION REVENUE APPLICABLE	(290,229)	(289,208)	(301,858)	(246,827)	(208,721)	(197,345)	(176,056)	(162,615)	(153,936)	(178,710)	(204,288)	(239,996)	(2,649,789)
6. CONSERVATION EXPENSES (FROM CT-3, PAGE 1, LINE 23)	91,710	119,118	194,559	296,269	155,055	282,718	137,117	198,498	194,416	254,227	176,034	150,852	2,249,573
7. TRUE-UP THIS PERIOD (LINE 5 - 6)	(198,519)	(170,090)	(107,299)	48,442	(53,666)	85,373	(38,930)	35,883	40,480	75,517	(28,254)	(89,144)	(400,216)
8. INTEREST PROVISION THIS PERIOD (FROM CT-3, PAGE 3, LINE 10)	(1,308)	(1,957)	(2,475)	(2,628)	(2,619)	(2,553)	(2,448)	(2,362)	(2,085)	(1,741)	(1,546)	(1,712)	(25,434)
9. TRUE-UP AND INTEREST PROVISION BEGINNING OF MONTH	(268,309)	(445,776)	(595,464)	(682,879)	(614,706)	(648,632)	(543,453)	(562,480)	(506,600)	(445,846)	(349,711)	(357,153)	(268,309)
9A. DEFERRED TRUE-UP BEGINNING OF PERIOD													
10. PRIOR TRUE-UP COLLECTED (REFUNDED)	22,360	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	22,359	268,309
11. TOTAL NET TRUE-UP (LINES 7+8+9+9A+10)	(445,776)	(595,464)	(682,879)	(614,706)	(648,632)	(543,453)	(562,480)	(506,600)	(445,846)	(349,711)	(357,153)	(425,650)	(425,650)

EXHIBIT NO. _____
DOCKET NO. 080004-GU
FLORIDA PUBLIC UTILITIES COMPANY
(MSS-1)
PAGE 6 OF 18

COMPANY: FLORIDA PUBLIC UTILITIES COMPANY

SCHEDULE CT-3
PAGE 3 OF 3

CALCULATION OF TRUE-UP AND INTEREST PROVISION

FOR MONTHS January-07 THROUGH December-07

C. INTEREST PROVISION	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	TOTAL
1. BEGINNING TRUE-UP (LINE B-9)	(268,309)	(445,776)	(595,464)	(682,879)	(614,706)	(648,632)	(543,453)	(562,480)	(506,600)	(445,846)	(349,711)	(357,153)	(268,309)
2. ENDING TRUE-UP BEFORE INTEREST (LINES B7+B9+B9A+B10)	(444,468)	(593,507)	(680,404)	(612,078)	(646,013)	(540,900)	(560,032)	(504,238)	(443,761)	(347,970)	(355,607)	(423,938)	(400,216)
3. TOTAL BEG. AND ENDING TRUE-UP	(712,777)	(1,039,283)	(1,275,868)	(1,294,857)	(1,260,719)	(1,189,531)	(1,103,485)	(1,066,718)	(950,361)	(793,816)	(705,318)	(781,090)	(668,525)
4. AVERAGE TRUE-UP (LINE C-3 X 50%)	(356,388)	(519,641)	(637,934)	(647,478)	(630,360)	(594,766)	(551,742)	(533,359)	(475,180)	(396,908)	(352,659)	(390,545)	(334,262)
5. INTEREST RATE - FIRST DAY OF REPORTING BUSINESS MONTH	4.30%	4.51%	4.53%	4.78%	4.96%	5.01%	5.29%	5.36%	5.27%	5.26%	5.27%	5.25%	5.27%
6. INTEREST RATE - FIRST DAY OF SUBSEQUENT BUSINESS MONTH	4.51%	4.53%	4.78%	4.96%	5.01%	5.29%	5.36%	5.27%	5.26%	5.27%	5.25%	5.27%	5.27%
7. TOTAL (LINE C-5 + C-6)	8.81%	9.04%	9.31%	9.74%	9.97%	10.30%	10.65%	10.63%	10.53%	10.53%	10.52%	10.52%	10.52%
8. AVG. INTEREST RATE (C-7 X 50%)	4.41%	4.52%	4.66%	4.87%	4.99%	5.15%	5.33%	5.32%	5.27%	5.27%	5.26%	5.26%	5.26%
9. MONTHLY AVERAGE INTEREST RATE	0.367%	0.377%	0.388%	0.406%	0.415%	0.429%	0.444%	0.443%	0.439%	0.439%	0.438%	0.438%	0.438%
10. INTEREST PROVISION (LINE C-4 X C-9)	(1,308)	(1,857)	(2,475)	(2,628)	(2,619)	(2,553)	(2,448)	(2,362)	(2,085)	(1,741)	(1,546)	(1,712)	(25,434)

EXHIBIT NO. _____
DOCKET NO. 080004-GU
FLORIDA PUBLIC UTILITIES COMPANY
(MSS-1)
PAGE 7 OF 18