Commissioners: Julie I. Brown, Chairman Lisa Polak Edgar Art Graham Ronald A. Brisé Jimmy Patronis

## STATE OF FLORIDA

OFFICE OF THE GENERAL COUNSEL KEITH C. HETRICK GENERAL COUNSEL (850) 413-6199

## **Public Service Commission**

June 21, 2016

## STAFF'S THIRD DATA REQUEST

Beth Keating Gunster Law Firm 215 S. Monroe Suite 601 Tallahassee, FL 32301 Bkeating@gunster.com

RE: Docket No. 160074-EQ – Petition for approval of new standard offer rate schedule for energy purchases from cogenerators and renewable facilities and for approval of standard offer contract for purchased of firm capacity and energy, by Florida Public Utilities Company.

Dear Beth Keating,

By this letter, the Commission staff requests that Florida Public Utilities Company (FPUC or Utility) provide responses to the following data requests.

- 1. Please provide a copy of the FERC Orders referenced in paragraph 7 of the Utility's petition.
- 2. Please provide a copy of JEA's and Gulf Power Company's standard offer contracts.
- 3. Please provide a copy of the Utility's full requirements contracts with its wholesale providers (JEA and Gulf Power Company).

## For Questions 4 through 6, please refer to the existing full requirements contracts with Gulf and JEA.

- 4. For Gulf and JEA, how is the capacity that FPUC is billed for determined?
  - a. Is there is a threshold below which reduction in load would not reduce contract payments?
  - b. Would delivery of firm capacity by a third party provider to the interconnection between FPUC and the full requirements supplier reduce contract payments?
- 5. For Gulf and JEA, please describe how a renewable provider wheeling firm capacity to the interconnection point between FPUC and the wholesale provider would be treated.

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a. Please provide an estimate of any reduction in payments based upon a 50 MW renewable facility providing firm capacity beginning January 1, 2017 at a capacity factor of 80% for 20 years. As part of this estimate, please complete the table below.

Full Requirements Supplier: [JEA / GPC]					
Year	Energy Payments	Capacity Payments	Other Payments (Specify)	Total Payments	
	\$(000)	\$(000)	\$(000)	\$(000)	
2017					
2018					
2019					
2020					
2021					
2022					
2023					
2024					
2025					
2026					
2027					
2028					
2029					
2030					
2031					
2032					
2033					
2034					
2035					
2036					
Total					
NPV (2017\$)					

- b. Please compare the estimated reduction in payments to the estimated payments to a renewable provider under each full requirement supplier's standard offer contract. If the reduction in payments is less than the payments under the standard offer, please explain how ratepayers will be held harmless under the proposed tariff. If the reduction in payments is greater than the payments under the standard offer, please explain how the renewable provider will be paid FPUC's incremental cost of electric energy and capacity under the proposed tariff.
- 6. For JEA and Gulf, please describe how a renewable provider supplying electricity from within FPUC's service territory would be treated.

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a. Please provide an estimate of any reduction in payments based upon a 50 MW renewable facility providing firm capacity beginning January 1, 2017 at a capacity factor of 80% for 20 years. As part of this estimate, please complete the table below.

Full Requirements Supplier: [JEA / GPC]						
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2025						
2026						
2027						
2028						
2029						
2030						
2031						
2032						
2033						
2034						
2035						
2036						
Total						
NPV (2017\$)						

b. Please compare the estimated reduction in payments to the estimated payments to a renewable provider under each full requirement supplier's standard offer contract. If the reduction in payments is less than the payments under the standard offer, please explain how ratepayers will be held harmless under the proposed tariff. If the reduction in payments is greater than the payments under the standard offer, please explain how the renewable provider will be paid FPUC's incremental cost of electric energy and capacity under the proposed tariff. Staff's Third Data Request Beth Keating Gunster Law Firm Page 4

Please file all responses electronically no later than Tuesday, July 12, 2016 from the Commission's website at <u>www.floridapsc.com</u>, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6191 if you have any questions.

Respectfully,

s/ Charles W. Murphy Charles W. Murphy Senior Attorney

CWM/dml

cc: Office of Commission Clerk