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September 27, 2016

BY ELECTRONIC FILING

Ms. Carlotta Stauffer, Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

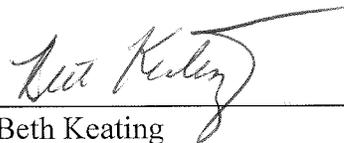
Re: Docket No. 160074-EQ: Petition for approval of new standard offer rate schedule for energy purchases from cogenerators and renewable facilities and for approval of standard offer contract for purchased of firm capacity and energy, by Florida Public Utilities Company.

Dear Ms. Stauffer:

Attached for electronic filing, please find a Florida Public Utilities Company's revised responses to Commission Staff's Third Set of Data Requests in the referenced docket. These revised responses are filed to reflect changes consistent with the revised and amended Tariff Sheet Nos. 18 and 24.0, filed under separate cover earlier today.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,



Beth Keating
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215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

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.

Florida Public Utilities Company’s Responses to Staff’s Third Set of Data Requests

Florida Public Utilities Company’s (“FPUC”) responses to Staff’s Third Data Requests are as follows:

1. Please provide a copy of the FERC Orders referenced in paragraph 7 of the Utility’s petition.

Company Response:

Copies of the referenced FERC orders are appended to these responses.

2. Please provide a copy of JEA’s and Gulf Power Company’s standard offer contracts.

Company Response:

FPUC is not in possession of Gulf Power’s standard offer contract. To the best FPUC’s knowledge and understanding, Gulf Power’s current standard offer contract can be accessed on the Florida Public Service Commission’s (“FPSC”) website at the following address:

<http://www.psc.state.fl.us/library/filings/16/01713-16/01713-16.pdf>

FPUC includes with these responses a copy of what it understands to be a JEA’s standard offer current through May 2015, which was obtained from the FPSC. FPUC has no knowledge as to whether this tariff has been updated since that time.

3. Please provide a copy of the Utility’s full requirements contracts with its wholesale providers (JEA and Gulf Power Company).

Company Response:

Copies of these contracts are appended to these responses. A copy of the Company’s Amendment No. 1 to its Generation Services Agreement with Gulf Power, which provides rates for 2018 and 2019 can be provided under separate cover, along with a request for confidential classification, upon request or can otherwise be made available for inspection with confidential terms protected.

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?

Company Response:

JEA – The monthly capacity used for billing is the maximum demand for the month based upon the JEA metering equipment located at the transmission delivery point.

Gulf – The monthly capacity used is the based on the annual Capacity Purchase calculation which is completed based on the methodology shown in Appendix A of the full requirements contract. That amount for 2016 is currently set at 91 MW's.

- a. Is there is a threshold below which reduction in load would not reduce contract payments?

Company Response:

JEA – No. Capacity payments to JEA are based on actual demand at the time of the monthly peak.

Gulf – Yes. Capacity payments to Gulf are based on a 91 MW minimum demand at the time of the monthly peak.

- b. Would delivery of firm capacity by a third party provider to the interconnection between FPUC and the full requirements supplier reduce contract payments?

Company Response:

JEA – Yes. Since capacity payments to JEA are based on actual demand at the time of the monthly peak, it is our understanding that the capacity payment would be decreased by the firm capacity delivered to the interconnection point by the third party.

Gulf – No. Since capacity payments to Gulf are based on a 91 MW demand each month the firm capacity delivery to the interconnection point by a third party would not decrease the capacity payment.

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.

- 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\$)				

Company Response:

At the outset, FPUC notes that, due to the relatively low system demand for both the NE and NE Divisions, it is not possible to take delivery of 50 MW's at an 80% capacity factor. In order to ensure the answers are meaningful, the Company's responses to this question are based upon a 20 MW renewable facility providing firm capacity beginning January 1, 2017 at a capacity factor of 80% for 20 years.

Attached are spreadsheets ("3rd Data Request #5A – JEA" and "3rd Data Request #5A – Gulf") for each wholesale provider showing the impact of a third party providing capacity and energy at the wholesale provider's delivery point under the currently approved standard offer contract and the proposed standard offer contract. As can be seen, the increase in rates to

FPU customers under the currently approved standard offer contract would be significant based on this delivery of capacity and energy. Using the methodology in the proposed standard offer contract there would be no increase to FPU customers.

The Company also notes the following in regard to this response:

JEA – The current contract with JEA expires December 31, 2017. FPU has begun the Purchase Power Solicitation process for a contract to begin January 1, 2018 but does not currently have information available for that time period. Responses will be based on the existing contract.

Gulf – The current contract with Gulf expires December 31, 2019. FPU has not yet begun the Purchase Power Solicitation process for a contract to begin January 1, 2020 and does not currently have information available for some of that time period. As such, responses are based on the existing contract.

- 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.

Company Response:

As shown in the examples above, FPU customers would be harmed significantly based on the currently approved standard offer contract. This results from the fact that FPU will be making a payment to the third party provider based on the wholesale providers contractual fuel cost while only being reimbursed by the wholesale provider based on the providers average hourly avoided cost. Since this reimbursement will be less than payment to the third party, FPU customers will see an overall increase in fuel cost recovery.

Under the proposed standard offer contract, the payments to the third party provider will match the wholesale provider's reimbursement to FPU which will result in no increase to FPU customers.

6. For JEA and Gulf, please describe how a renewable provider supplying electricity from within FPUC's service territory would be treated.

- 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\$)				

Company Response:

Consistent with FPUC’s response to Data Request 5 above, the Company again notes that, due to the relatively low system demand for both the NE and NE Divisions, it is not possible to take delivery of 50 MW’s at an 80% capacity factor. Thus, in order to ensure the answers are meaningful, responses will be based upon a 20 MW renewable facility providing firm capacity beginning January 1, 2017 at a capacity factor of 80% for 20 years.

Attached is a spreadsheet (“3rd Data Request #6A – JEA” and “3rd Data Request – Gulf”) for each wholesale provider showing the impact of a third party providing capacity and energy within the service territory under

the proposed standard offer contract. As can be seen, the payments to these third party providers will be increased above those outside the service territory while avoiding any negative impact to FPU customers.

As the attached spreadsheets reflect, for third party providers located within the FPU service territory, payments to the wholesale providers are reduced above the level of reductions shown for those third party providers located outside of the service territory. These deliveries made within the service territory provide for an increased reduction based on the fact that these do not pass through the wholesale providers meter.

The in-service territory location provides for a reduction in transmission lines losses and full avoidance of the fuel, energy, environmental, transmission and capacity billing components in certain instances. Also, in service territory providers provide other less measurable benefits such as system stabilization, capacity redundancy and overall system reliability. The proposed standard offer contract will take into account these factors which will provide additional payments to third party provider within the service territory while avoiding cost increases to customers.

Also, the Company also notes the following in regard to this response:

JEA – The current contract with JEA expires December 31, 2017. FPU has begun the Purchase Power Solicitation process for a contract to begin January 1, 2018 but does not currently have information available for that time period. Responses will be based on the existing contract.

Gulf – The current contract with Gulf expires December 31, 2019. FPU has not yet begun the Purchase Power Solicitation process for a contract to begin January 1, 2020 and does not currently have information available for some of that time period. Responses will be based on the existing contract.

- 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.

Company Response:

Under the proposed standard offer contract for third party providers within the service territory, the payment would be based on the billing components that are avoided by having capacity and energy not passing

through the wholesale provider's meter. In general this would include the Energy Cost Component (NE Florida Only), Environmental Cost Component, Fuel Cost Component, Capacity Cost Component (NE Florida only) and avoided transmission line losses. The overall reduction in the actual bill from the wholesale provider would be reduced by the Energy Cost Component (NE Florida Only), Environmental Cost Component, Fuel Cost Component, Capacity Cost Component (NE Florida Only) and avoided transmission line losses.

This difference actually results in a benefit to both third party providers within the service territory and an overall reduction in purchased power cost which provides the same benefit to FPU customers. Third party providers are reimbursed for energy and capacity (NE Florida only) at a cost above that of providers outside the service territory based on the benefits discussed above. Details for provided with the attachments provided in 6a.

The Transmission Billing Component has not been included in the detailed analysis provided. FPU is uncertain on exactly how this will be handled in the future and is therefore not included. However, should it be determined that this factor would be avoided in billing from the wholesale provide, it could provide additional benefits to third party providers and FPU customers.

Currently Approved Standard Offer Contract (provider located outside FPU Service Territory)

Firm Capacity Amount (MW)	20
Capacity Factor	80%
Resulting Energy (MWH)	140,160

Gulf Full Requirements Supplier

Capacity Cost (\$/KW)	\$0.00
Energy Cost (\$/KWH)	\$0.00000
Environmental Cost (\$/KWH)	\$0.01834
Fuel Cost (\$/KWH)	\$0.03964
Transmission Cost (\$/KW)	\$2.94
Gulf Avoided Cost (\$MWH)	\$0.03100 Estimate

NOTE: The FPU Payment to Gulf and the FPU Payment to the Third Party Supplier are the same under the existing standard offer contract.

NOTE: The reimbursement from Gulf to FPU for the energy from the Third Party Provider would be at the Gulf average hourly avoided cost which has been estimated based on previous information from Gulf

NOTE: There is no capacity impact since the payment for capacity from FPU to Gulf is a fixed monthly payment and is not related to metered Demand.

Payment to Third Party based on current SOC				
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)
2017	\$5,556	\$0	\$0	\$5,556
2018	\$5,556	\$0	\$0	\$5,556
2019	\$5,556	\$0	\$0	\$5,556
2020	\$5,556	\$0	\$0	\$5,556
2021	\$5,556	\$0	\$0	\$5,556
2022	\$5,556	\$0	\$0	\$5,556
2023	\$5,556	\$0	\$0	\$5,556
2024	\$5,556	\$0	\$0	\$5,556
2025	\$5,556	\$0	\$0	\$5,556
2026	\$5,556	\$0	\$0	\$5,556
2027	\$5,556	\$0	\$0	\$5,556
2028	\$5,556	\$0	\$0	\$5,556
2029	\$5,556	\$0	\$0	\$5,556
2030	\$5,556	\$0	\$0	\$5,556
2031	\$5,556	\$0	\$0	\$5,556
2032	\$5,556	\$0	\$0	\$5,556
2033	\$5,556	\$0	\$0	\$5,556
2034	\$5,556	\$0	\$0	\$5,556
2035	\$5,556	\$0	\$0	\$5,556
2036	\$5,556	\$0	\$0	\$5,556
Total	\$111,119	\$0	\$0	\$111,119
NPV (2017\$)	\$90,848	\$0	\$0	\$90,848
Rate	2%			

Gulf Credit to FPU for Third Party Capacity & Energy					Additional Capacity & Energy Payment (\$000)
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)	
2017	\$4,345	\$0	\$0	\$4,345	\$1,211
2018	\$4,345	\$0	\$0	\$4,345	\$1,211
2019	\$4,345	\$0	\$0	\$4,345	\$1,211
2020	\$4,345	\$0	\$0	\$4,345	\$1,211
2021	\$4,345	\$0	\$0	\$4,345	\$1,211
2022	\$4,345	\$0	\$0	\$4,345	\$1,211
2023	\$4,345	\$0	\$0	\$4,345	\$1,211
2024	\$4,345	\$0	\$0	\$4,345	\$1,211
2025	\$4,345	\$0	\$0	\$4,345	\$1,211
2026	\$4,345	\$0	\$0	\$4,345	\$1,211
2027	\$4,345	\$0	\$0	\$4,345	\$1,211
2028	\$4,345	\$0	\$0	\$4,345	\$1,211
2029	\$4,345	\$0	\$0	\$4,345	\$1,211
2030	\$4,345	\$0	\$0	\$4,345	\$1,211
2031	\$4,345	\$0	\$0	\$4,345	\$1,211
2032	\$4,345	\$0	\$0	\$4,345	\$1,211
2033	\$4,345	\$0	\$0	\$4,345	\$1,211
2034	\$4,345	\$0	\$0	\$4,345	\$1,211
2035	\$4,345	\$0	\$0	\$4,345	\$1,211
2036	\$4,345	\$0	\$0	\$4,345	\$1,211
Total	\$86,899	\$0	\$0	\$86,899	\$24,220
NPV (2017\$)	\$71,046	\$0	\$0	\$71,046	\$19,801

Proposed Standard Offer Contract (provider located outside FPU Service Territory)

Firm Capacity Amount (MW)	20
Capacity Factor	80%
Resulting Energy (MWH)	140,160

NOTE: The FPU Payment to Gulf and the FPU Payment to the Third Party Supplier are different under the proposed standard offer contract.

Gulf Full Requirements Supplier

Capacity Cost (\$/KW)	\$0.00
Energy Cost (\$/KWH)	\$0.00000
Environmental Cost (\$/KWH)	\$0.01834
Fuel Cost (\$/KWH)	\$0.03964
Transmission Cost (\$/KW)	\$2.94
Gulf Avoided Cost (\$MWH)	\$0.03100 Estimate

NOTE: The reimbursement from Gulf to FPU for the energy from the Third Party Provider would be at the Gulf average hourly avoided cost which has been estimated based on previous information from Gulf. This amount would match the FPU payment to the Third Party Supplier.

NOTE: There is no capacity impact since the payment for capacity from FPU to Gulf is a fixed monthly payment and is not related to metered Demand.

Payment to Third Party based on proposed SOC				
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)
2017	\$5,556	\$0	\$0	\$5,556
2018	\$5,556	\$0	\$0	\$5,556
2019	\$5,556	\$0	\$0	\$5,556
2020	\$5,556	\$0	\$0	\$5,556
2021	\$5,556	\$0	\$0	\$5,556
2022	\$5,556	\$0	\$0	\$5,556
2023	\$5,556	\$0	\$0	\$5,556
2024	\$5,556	\$0	\$0	\$5,556
2025	\$5,556	\$0	\$0	\$5,556
2026	\$5,556	\$0	\$0	\$5,556
2027	\$5,556	\$0	\$0	\$5,556
2028	\$5,556	\$0	\$0	\$5,556
2029	\$5,556	\$0	\$0	\$5,556
2030	\$5,556	\$0	\$0	\$5,556
2031	\$5,556	\$0	\$0	\$5,556
2032	\$5,556	\$0	\$0	\$5,556
2033	\$5,556	\$0	\$0	\$5,556
2034	\$5,556	\$0	\$0	\$5,556
2035	\$5,556	\$0	\$0	\$5,556
2036	\$5,556	\$0	\$0	\$5,556
Total	\$111,119	\$0	\$0	\$111,119
NPV (2017\$)	\$90,848	\$0	\$0	\$90,848
Rate	2%			

Gulf Credit to FPU for Third Party Capacity & Energy					Additional Capacity & Energy Payment (\$000)
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)	
2017	\$4,345	\$0	\$0	\$4,345	\$1,211
2018	\$4,345	\$0	\$0	\$4,345	\$1,211
2019	\$4,345	\$0	\$0	\$4,345	\$1,211
2020	\$4,345	\$0	\$0	\$4,345	\$1,211
2021	\$4,345	\$0	\$0	\$4,345	\$1,211
2022	\$4,345	\$0	\$0	\$4,345	\$1,211
2023	\$4,345	\$0	\$0	\$4,345	\$1,211
2024	\$4,345	\$0	\$0	\$4,345	\$1,211
2025	\$4,345	\$0	\$0	\$4,345	\$1,211
2026	\$4,345	\$0	\$0	\$4,345	\$1,211
2027	\$4,345	\$0	\$0	\$4,345	\$1,211
2028	\$4,345	\$0	\$0	\$4,345	\$1,211
2029	\$4,345	\$0	\$0	\$4,345	\$1,211
2030	\$4,345	\$0	\$0	\$4,345	\$1,211
2031	\$4,345	\$0	\$0	\$4,345	\$1,211
2032	\$4,345	\$0	\$0	\$4,345	\$1,211
2033	\$4,345	\$0	\$0	\$4,345	\$1,211
2034	\$4,345	\$0	\$0	\$4,345	\$1,211
2035	\$4,345	\$0	\$0	\$4,345	\$1,211
2036	\$4,345	\$0	\$0	\$4,345	\$1,211
Total	\$86,899	\$0	\$0	\$86,899	\$24,220
NPV (2017\$)	\$71,046	\$0	\$0	\$71,046	\$19,801

Docket #160074-EQ
 Response for Staff's Third Data Request
 Question 6A

Firm Capacity Amount (MW)	20
Capacity Factor	80%
Resulting Energy (MWH)	140,160

Gulf Full Requirement Supplier

Capacity Cost (\$/KW)	\$0.00
Energy Cost (\$/KWH)	\$0.00000
Environmental Cost (\$/KWH)	\$0.01834
Fuel Cost (\$/KWH)	\$0.03964
Transmission Cost (\$/KW)	\$2.94
Avoided Transmission Losses	1.5%
Gulf Avoided Cost (\$MWH)	\$0.03500 Estimate

Note: Provider is located inside the FPU Service Territory

NOTE: The FPU Payment to the Third Party provider would be based on the full reduction in fuel cost and line losses based on the proposed standard offer contract.

NOTE: The reduction in the Gulf billing to FPU would include the environmental, fuel and line loss components due to the fact that the energy and capacity are not metered by JEA at the interconnection point.

NOTE: There is no capacity impact since the payment for capacity to FPU from Gulf is a fixed monthly payment and is not related to metered Demand.

FPU Payment to Third Party based on proposed SOC				
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)
2017	\$8,250	\$0	\$0	\$8,250
2018	\$8,250	\$0	\$0	\$8,250
2019	\$8,250	\$0	\$0	\$8,250
2020	\$8,250	\$0	\$0	\$8,250
2021	\$8,250	\$0	\$0	\$8,250
2022	\$8,250	\$0	\$0	\$8,250
2023	\$8,250	\$0	\$0	\$8,250
2024	\$8,250	\$0	\$0	\$8,250
2025	\$8,250	\$0	\$0	\$8,250
2026	\$8,250	\$0	\$0	\$8,250
2027	\$8,250	\$0	\$0	\$8,250
2028	\$8,250	\$0	\$0	\$8,250
2029	\$8,250	\$0	\$0	\$8,250
2030	\$8,250	\$0	\$0	\$8,250
2031	\$8,250	\$0	\$0	\$8,250
2032	\$8,250	\$0	\$0	\$8,250
2033	\$8,250	\$0	\$0	\$8,250
2034	\$8,250	\$0	\$0	\$8,250
2035	\$8,250	\$0	\$0	\$8,250
2036	\$8,250	\$0	\$0	\$8,250
Total	\$165,005	\$0	\$0	\$165,005
NPV (2017\$)	\$134,903	\$0	\$0	\$134,903
Rate	2%			

Reduction in Gulf billing to FPU due to Third Party Capacity & Energy					Savings from Capacity & Energy Payment (\$000)
Year	Annual Energy Payments \$(000)	Annual Capacity Payments \$(000)	Annual Other Payments \$(000)	Annual Total Payments \$(000)	
2017	\$8,250	\$0	\$0	\$8,250	\$0
2018	\$8,250	\$0	\$0	\$8,250	\$0
2019	\$8,250	\$0	\$0	\$8,250	\$0
2020	\$8,250	\$0	\$0	\$8,250	\$0
2021	\$8,250	\$0	\$0	\$8,250	\$0
2022	\$8,250	\$0	\$0	\$8,250	\$0
2023	\$8,250	\$0	\$0	\$8,250	\$0
2024	\$8,250	\$0	\$0	\$8,250	\$0
2025	\$8,250	\$0	\$0	\$8,250	\$0
2026	\$8,250	\$0	\$0	\$8,250	\$0
2027	\$8,250	\$0	\$0	\$8,250	\$0
2028	\$8,250	\$0	\$0	\$8,250	\$0
2029	\$8,250	\$0	\$0	\$8,250	\$0
2030	\$8,250	\$0	\$0	\$8,250	\$0
2031	\$8,250	\$0	\$0	\$8,250	\$0
2032	\$8,250	\$0	\$0	\$8,250	\$0
2033	\$8,250	\$0	\$0	\$8,250	\$0
2034	\$8,250	\$0	\$0	\$8,250	\$0
2035	\$8,250	\$0	\$0	\$8,250	\$0
2036	\$8,250	\$0	\$0	\$8,250	\$0
Total	\$165,005	\$0	\$0	\$165,005	\$0
NPV (2017\$)	\$134,903	\$0	\$0	\$134,903	\$0