

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: May 29, 2018

TO: Carlotta S. Stauffer, Commission Clerk, Office of Commission Clerk

FROM: Rachael Dziechciarz, Senior Attorney, Office of the General Counsel *RD*

RE: Docket No. 20180061-EU – Petition for limited proceeding to recover incremental storm restoration costs, by Florida Public Utilities Company.

Please place Staff's 3rd Data Request (attached) in the above referenced docket file.

COMMISSIONERS:
ART GRAHAM, CHAIRMAN
JULIE I. BROWN
DONALD J. POLMANN
GARY F. CLARK
ANDREW GILES FAY

STATE OF FLORIDA



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

Public Service Commission

May 29, 2018

Beth Keating, Esquire
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, FL 32301

STAFF'S 3RD DATA REQUEST
via e-mail

Mike Cassel
Director, Regulatory and Governmental Affairs
Florida Public Utilities Company/Chesapeake
1750 South 14th Street, Suite 200
Fernandina Beach, FL 32034

RE: Docket No. 20180061-EU – Petition for limited proceeding to recover incremental storm restoration costs, by Florida Public Utilities Company.

Dear Ms. Keating and Mr. Cassel:

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

- 1) Please refer to page 5, paragraph 14, of FPUC's petition which states that neither the 2014 nor the 2017 agreements have an impact on the petition.
 - a. Please explain why FPUC is proposing to recover costs for the Blountstown/Bristol Storm, which occurred in 2015. It appears this storm happened under the 2014 agreement, which included recovery of named storms.
 - b. Please explain why FPUC is proposing to recover costs for the Marianna Storm, which occurred in 2016. It appears this storm happened under the 2014 agreement, which included recovery of named storms.
- 2) For each storm, and for both the NE and NW divisions, please provide total replacement costs (capital and O&M) for the items identified in a-c below:
 - a. Average pole replacement costs
 - b. Average conductor replacement costs per foot

- c. Average transformer replacement costs.
 - d. If the replacement cost of the items identified above varies by more than 10 percent, from one division to the next, please explain why.
- 3) Please refer to FPUC's responses to Office of Public Counsel (OPC) Interrogatory Nos. 4 and 10. FPUC's response to OPC Interrogatory No. 4 indicates that conductors were replaced for the Marianna Storm and the NW Storm 2/7/17; however, the costs of conductor replacements for these storms were not included in FPUC's response to OPC Interrogatory No. 10. Please explain this discrepancy.
 - 4) FPUC's response to OPC Interrogatory No. 4 indicates that for Hurricane Irma, 24 transformers were replaced in the NE division and 8 were replaced in the NW division. However, FPUC's response to OPC Interrogatory No. 12 indicates that 28 transformers were replaced in the NE division. Please reconcile the difference in FPUC's responses. Also, please provide the cost to replace the transformers in the NW division for Hurricane Irma.
 - 5) Please refer to FPUC's response to OPC Interrogatory No. 14. This response did not provide cost information for the conductors that were replaced during Hurricane Irma, Hurricane Matthew, the Marianna storm, and the NW Storm 2/7/17, as indicated in FPUC's response to OPC Interrogatory No. 4. Please provide the costs, or an explanation as to why these costs were not included in this response.
 - 6) For each storm referenced in Attachment A to FPUC's Petition, please provide costs associated with the categories listed below. Also, if applicable, please explain any differences in the costs provided in this response, when compared to FPUC's responses to OPC Interrogatories identified below.
 - a. Regular Payroll – OPC Interrogatory No. 17
 - b. Overtime Payroll – OPC Interrogatory No. 17
 - c. Contractors – OPC Interrogatory No. 34
 - d. Line Clearing – OPC Interrogatory No. 32
 - e. Vehicles & Fuels – OPC Interrogatory No. 39
 - f. Materials & Supplies – OPC Interrogatory No. 38
 - g. Logistics – OPC Interrogatory No. 40
 - h. Other – OPC Interrogatory No. 40

Staff's 3rd Data Request
Docket No. 20180061-EI
Page 3

Please file all responses electronically no later than June 13, 2018 from the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. Please feel free to call me at (850) 413-6212 if you have any questions.

Sincerely,

/s/ Rachael Dziechciarz
Senior Attorney

cc: Office of Commission Clerk