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March 8, 2019

E-PORTAL FILING

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

Re: Docket No. 20190036-GU: Petition for authority for approval of revised transportation imbalance tariffs, by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade.

Dear Mr. Teitzman:

Attached for filing in the referenced docket, please find Florida Public Utilities Company's responses to Staff's First Data Requests in the referenced docket.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions or concerns.

Kind regards,

Beth Keating

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Enclosure

Cc: Johanna Nieves – Office of General Counsel A. Mireille Fall-Fry – Office of Public Counsel Re: Docket No. 20190036-GU: Petition for authority for approval of revised transportation imbalance tariffs, by Florida Public Utilities Company, Florida Public Utilities Company-Fort Meade.

Florida Public Utilities Company's Responses to Staff's First Data Requests (1-10)

1. Please state the current number of transportation customers for FPUC and for FPUC-Fort Meade.

Company Response:

The current numbers are: 2,369 FPUC at 1/31/2019 and 7 FPUC-Fort Meade at 1/31/2019.

2. Please state the current number of sales customers for FPUC and for FPUC-Fort Meade.

Company Response:

Currently, there are 58,733 with FPUC as of 1/31/2019 and 584 with FPUC-Fort Meade as of 1/31/2019.

3. Please state the current number of pool managers for FPUC and for FPUC-Fort Meade.

Company Response:

Currently, there are 13 pool managers for FPUC and FPUC-Fort Meade.

4. Please provide monthly short and long imbalance quantities for FPUC and for FPUC-Fort Meade over the last three years, 2015-2018.

Company Response:

Below are the imbalance quantities for FPUC and FPUC-Fort Meade for the time periods requested. The imbalances provided are a net total of each pool manager's imbalance, some of which are long and some of which are short. Long imbalances are listed in parentheses.

	FPUC & FPUC-Ft. Meade Imbalance Consolidated		FPUC & FPUC-Ft. Meade Imbalance Consolidated		FPUC & FPUC-Ft. Meade	-	FPUC & FPUC-Ft. Meade
Month/Year		Month/Year		8.4===b /V====	Imbalance Consolidated		Imbalance Consolidated
	The second secon			Month/Year	(Inerms)	Month/Year	(Inerms)
Jan-15	(380,330.64)	Jan-16	(584,557.02)	Jan-17	(197,307.08)	Jan-18	(172,311.94)
Feb-15	(227,951.32)	Feb-16	(252,004.41)	Feb-17	(549,416.56)	Feb-18	(412,622.40)
Mar-15	(306,511.45)	Mar-16	(361,602.32)	Mar-17	(409,936.14)	Mar-18	(417,760.51)
Apr-15	(437,627.48)	Apr-16	(398,808.63)	Apr-17	(638,354.34)	Apr-18	(438,605.33)
May-15	(434,610.91)	May-16	(391,348.15)	May-17	(553,240.28)	May-18	(426,716.19)
Jun-15	(371,316.76)	Jun-16	(371,621.70)	Jun-17	(591,437.10)	Jun-18	(235,538.28)
Jul-15	(382,039.74)	Jul-16	(368,349.11)	Jul-17	(679,013.33)	Jul-18	(521,943.15)
Aug-15	(420,072.78)	Aug-16	(288,424.71)	Aug-17	(338,154.78)	Aug-18	(496, 169.04)
Sep-15	(490,266.02)	Sep-16	(417,616.22)	Sep-17	(923,273.13)	Sep-18	(440,797.18)
Oct-15	(354,609.46)	Oct-16	(461,331.34)	Oct-17	(398,350.95)	Oct-18	(218,385.45)
Nov-15	(373,679.85)	Nov-16	(267,057.08)	Nov-17	(394,627.12)	Nov-18	(100,179.35)
Dec-15	(465,980.74)	Dec-16	(411,449.54)	Dec-17	(283,960.37)	Dec-18	(261,345.43)
Total	(4,644,997.15)		(4,574,170.23)		(5,957,071.18)		(4,142,374.25)

5. Paragraph 14 of the petition states that the payments to the shippers for settlements have increased by approximately 164% over the last three years (2015-2018). What is the annual dollar amount of this payout for each of these years?

Company Response:

The annual payout for 2015 to 2018 is as follows:

2015	\$2,109,998.77
2016	\$2,821,846.40
2017	\$4,955,915.16
2018	\$3,452,811.66

To clarify, the 2018 annual payout amount is 164% of the 2015 annual payout amount, an increase of 64% between 2015 - 2018.

6. Please indicate in which Schedule and line of the PGA projection filing any payments to pool managers or long imbalances or revenues from pool managers for short imbalances are included.

Company Response:

Payments to pool managers for long imbalances or revenues from pool managers for short imbalances are not currently included in the Company's PGA projection filing.

7. Have the pool managers been informed of this petition? Please discuss their perception of this petition.

Company Response:

Yes. The Company communicated, with affected pool managers, about the plan within a week of the petition being filed to explain the approach. The Company was also informally speaking to pool managers about this prior to the filing as well. The Companies pool managers have been supportive of this effort, as well as the Companies desire to identify consistent methodologies across the Florida platforms.

8. Referring to paragraph 12, please explain how Central Florida Gas (CFG) acquires capacity and natural gas to sell to pool managers that end in a short position.

Company Response:

CFG acquires the capacity and natural gas needed to sell, to pool managers that end in a short position, from the interstate pipelines. Through their cash out mechanism, the interstate pipelines sell the natural gas needed to CFG, which CFG then sells to the pool manager who ended in a short position.

9. Referring to paragraph 12, please explain what CFG does with excess gas purchased from pool managers that end in a long position.

Company Response:

Similarly to the response in question 8 above, CFG sells excess gas received from pool managers in a long position back to the interstate pipelines through their cash out mechanism.

10. Please discuss why the PGA rate is typically higher than index prices, such as the NYMEX.

Company Response:

The unit price is typically higher than the cash prices reflected in the market due to costs related to our purchase gas functions and monthly interstate and intrastate pipeline demand charges for capacity that are included in the Companies' PGA rates.