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September 25, 2020

BY E-PORTAL

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

Re: Docket No. 20200203-GU: Joint petition for approval of swing service rider rates for January through December 2021, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.

Dear Mr. Teitzman:

Attached for electronic filing, please find the Responses of the Florida Public Utilities Company entities and the Florida Division of Chesapeake Utilities Corporation to Staff's First Data Requests in the referenced docket.

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,

s/Beth Keating
Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

Cc:// Office of Public Counsel (Kelly, Morse)

Re: Docket No. 20200203-GU: Joint petition for approval of swing service rider rates for January through December 2021, by Florida Public Utilities Company, Florida Public Utilities Company-Indiantown Division, Florida Public Utilities Company-Fort Meade, and Florida Division of Chesapeake Utilities Corporation.

1. Please provide Schedules A through D attached to the direct testimony of witness Derrick Craig in Excel format with formulas intact.

Company's Response:

Please refer to Attachment 1.

Respondent: Derrick Craig

2. Referring to the direct testimony of witness Craig, Schedule D in Docket No. 20190160-GU, the cost for the Belvedere project was \$376,362. In the pending Docket No. 20200203-GU, the Belvedere project cost is \$645,192. Please explain the reasons for this increase.

Company's Response:

Last year's Docket No. 20190160-GU included only seven months of actual costs, whereas the current Docket No. 20200203-GU includes twelve months (a full year), which is the reason for this increase.

Respondent: Derrick Craig

3. Referring to Schedule D of Witness Craig's direct testimony in the pending docket, please discuss the types of transportation costs listed for Arden FPU AGL, Auburndale, Western Palm Beach County, Martin Riviera FPU FSEC, Emera Energy Services Inc., and Marlin Gas Services LLC. Please refer to any Commission docket(s) addressing the new costs listed above.

Company's Response:

Please refer to Attachment 2.

Respondent: Derrick Craig

4. In Docket No. 20190160-GU, the special contract swing service charge to be recovered in 2020 was \$7,311,810 from six special contract customers. In the pending Docket No. 20200203-GU, special contract swing service charge to be recovered in 2021 is \$12,090,834. Please explain the reasons for this increase.

Company Response:

The increases are due to the new transportation service agreements identified in Question #3 above. See Attachment 2.

Respondent: Derrick Craig

5. Referring to Schedule D of Witness Craig's direct testimony in Docket No. 20190160-GU, the swing service contract with Peoples Gas System was \$1,036,868 while in the pending docket, the swing service contract with Peoples Gas System has increased to \$2,074,287. Please explain the reasons for this increase and refer to any Commission docket(s) that approved a special contract with Peoples Gas System.

Company Response:

The increase is due to revenues projected for a full year in the current Docket No. 20200203-GU, versus only six months in last year's Docket No. 20190164-GU, which was based on the anticipated in-service date of the pipeline.

Respondent: Derrick Craig

		2019-2020 Monthly Volumes - Therms													
		JULY	AUGUST	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY	MARCH	APRIL	MAY	JUNE	Annual Total- peak	Annual Total
LDC	Customer Class														
FPU	FPU - RS	668,341	686,051	744,923	779,872	1,048,477	1,664,737	1,891,241	1,677,874	1,521,634	1,400,471	1,306,733	993,213	12,492,326	14,383,567
FPU	FPU - RS-GS	2,108	2,337	3,180	3,141	4,966	7,668	8,880	8,189	6,928	6,827	6,243	4,099	55,688	64,567
FTM	FT-RS	3,951	4,289	4,190	4,373	4,843	7,729	8,152	7,549	6,798	6,009	5,323	4,576	59,630	67,782
FPU	FPU - GS - 1	55,015	63,249	69,217	73,986	91,244	103,246	112,595	105,232	95,836	55,781	54,247	57,078	824,130	936,724
FPU	FPU - GS - 2	367,312	455,321	459,654	471,511	558,145	689,894	753,629	711,407	634,567	415,226	367,518	372,169	5,502,723	6,256,351
FPU	FPU - CS - GS	2,772	3,303	3,667	5,029	4,727	7,099	9,580	8,305	7,563	5,300	4,957	3,496	56,218	65,797
FPU	FPU - LVS	642,125	672,481	580,866	637,930	763,359	880,746	974,677	890,404	768,486	520,549	532,531	504,845	7,394,322	8,368,999
FPU FPU	FPU - IS FPU - GLS	10,150	9,365	- 9,526	- 9,526	- 9,526	- 9,526	- 8,386	9,802	9,094	- 9,094	9,094	- 9,094	0 103,799	- 112,186
FTM	FT-Comm PA	10,150	9,305	9,526	9,526	9,526	9,526	8,386 45	9,802 65	9,094	9,09 4 5	9,094	9,094	103,799	325
FTM	FT-Comm Small	2,059	10,567	9,781	12,903	16,377	24,867	23,252	26,262	23,616	15,649	6,008	6,947	155,035	
	Total PGA Volumes	1,753,834	1,906,970	1,885,023	1,998,277	2,501,679	3,395,602	3,790,436	3,445,089	3,074,564	2,434,912	2,292,660	1,955,541	26,644,150	
	Total 1 G/1 Volumes	1,755,651	1,500,570	1,003,023	1,550,277	2,302,073	3,333,002	3,730,130	3,113,003	3,07 1,50 1	2,131,312	2,232,000	1,555,511	20,011,230	30, 13 1,300
	Total Transport Volumes	6,643,878	6,727,041	6,218,111	6,731,086	7,395,637	7,991,884	8,250,670	7,865,757	7,716,756	6,076,272	6,073,115	6,001,120	75,440,658	83,691,328
	Total Billed Volumes To Be Allocated FRS	8,397,712	8,634,011	8,103,134	8,729,362	9,897,316	11,387,486	12,041,106	11,310,846	10,791,320	8,511,184	8,365,775	7,956,661	102,084,808	114,125,914
		31	31	30	31	30	31	31	28	31	30	31	30	334	ļ.
LDC	Customer Class						2019 - 2020 Daily								
FPU	FPU - RS	21,559	22,131	24,831	25,157	34,949	53,701	61,008	59,924	49,085	46,682	42,153	33,107	37,402	
FPU	FPU - RS-GS	68	75	106 140	101	166	247	286	292	223	228	201	137 153	167	
FTM FPU	FT-RS	127	138		141	161	249	263	270	219	200 1.859	172 1.750		179 2,467	
FPU		1 775						2 622							
	FPU - GS - 1	1,775	2,040 14 688	2,307 15,322	2,387 15,210	3,041 18,605	3,331	3,632	3,758 25,407	3,091	,	,	1,903		
	FPU - GS - 2	11,849	14,688	15,322	15,210	18,605	22,255	24,311	25,407	20,470	13,841	11,855	12,406	16,475	
FPU FPU	FPU - GS - 2 FPU - CS - GS	, .	,	,	,		-,	-,	-,	-,	,	,		16,475 168	
FPU	FPU - GS - 2	11,849 89	14,688 107	15,322 122	15,210 162	18,605 158	22,255 229	24,311 309	25,407 297	20,470 244	13,841 177	11,855 160	12,406 117	16,475	
FPU FPU	FPU - GS - 2 FPU - CS - GS FPU - LVS	11,849 89 20,714	14,688 107 21,693	15,322 122 19,362	15,210 162 20,578	18,605 158 25,445	22,255 229 28,411	24,311 309 31,441	25,407 297 31,800	20,470 244 24,790	13,841 177 17,352	11,855 160 17,178	12,406 117 16,828	16,475 168 22,139	
FPU FPU FPU	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS	11,849 89 20,714 0	14,688 107 21,693	15,322 122 19,362 0	15,210 162 20,578 0	18,605 158 25,445 0	22,255 229 28,411 0	24,311 309 31,441 0	25,407 297 31,800 0	20,470 244 24,790 0	13,841 177 17,352 0	11,855 160 17,178 0	12,406 117 16,828 0	16,475 168 22,139 0	
FPU FPU FPU FPU	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS	11,849 89 20,714 0 327	14,688 107 21,693 0 302	15,322 122 19,362 0 318	15,210 162 20,578 0 307	18,605 158 25,445 0 318	22,255 229 28,411 0 307	24,311 309 31,441 0 271	25,407 297 31,800 0 350	20,470 244 24,790 0 293	13,841 177 17,352 0 303	11,855 160 17,178 0 293	12,406 117 16,828 0 303	16,475 168 22,139 0 311	
FPU FPU FPU FPU FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA	11,849 89 20,714 0 327	14,688 107 21,693 0 302	15,322 122 19,362 0 318	15,210 162 20,578 0 307	18,605 158 25,445 0 318	22,255 229 28,411 0 307 3	24,311 309 31,441 0 271	25,407 297 31,800 0 350 2	20,470 244 24,790 0 293	13,841 177 17,352 0 303	11,855 160 17,178 0 293	12,406 117 16,828 0 303	16,475 168 22,139 0 311	
FPU FPU FPU FPU FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small	11,849 89 20,714 0 327 0 66	14,688 107 21,693 0 302 0	15,322 122 19,362 0 318 1	15,210 162 20,578 0 307 0 416	18,605 158 25,445 0 318 1 546	22,255 229 28,411 0 307 3 802	24,311 309 31,441 0 271 1 750	25,407 297 31,800 0 350 2 938	20,470 244 24,790 0 293 1 762	13,841 177 17,352 0 303 0 522	11,855 160 17,178 0 293 0	12,406 117 16,828 0 303 1 232	16,475 168 22,139 0 311 1	
FPU FPU FPU FPU FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small Total PGA Volumes	11,849 89 20,714 0 327 0 66 56,575	14,688 107 21,693 0 302 0 341 61,515	15,322 122 19,362 0 318 1 326 62,834	15,210 162 20,578 0 307 0 416 64,461	18,605 158 25,445 0 318 1 546 83,389	22,255 229 28,411 0 307 3 802 109,536	24,311 309 31,441 0 271 1 750 122,272	25,407 297 31,800 0 350 2 938 123,039	20,470 244 24,790 0 293 1 762 99,179	13,841 177 17,352 0 303 0 522 81,164	11,855 160 17,178 0 293 0 194 73,957	12,406 117 16,828 0 303 1 232 65,185	16,475 168 22,139 0 311 1 464 79,773	
FPU FPU FPU FPU FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small Total PGA Volumes Total Transport Volumes	11,849 89 20,714 0 327 0 66 56,575 214,319	14,688 107 21,693 0 302 0 341 61,515 217,001	15,322 122 19,362 0 318 1 326 62,834 207,270	15,210 162 20,578 0 307 0 416 64,461 217,132	18,605 158 25,445 0 318 1 546 83,389 246,521	22,255 229 28,411 0 307 3 802 109,536	24,311 309 31,441 0 271 1 750 122,272 266,151	25,407 297 31,800 0 350 2 938 123,039 280,920	20,470 244 24,790 0 293 1 762 99,179 248,928	13,841 177 17,352 0 303 0 522 81,164	11,855 160 17,178 0 293 0 194 73,957	12,406 117 16,828 0 303 1 232 65,185 200,037	16,475 168 22,139 0 311 1 464 79,773 225,870	
FPU FPU FPU FPU FTM FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small Total PGA Volumes Total Transport Volumes	11,849 89 20,714 0 327 0 66 56,575 214,319	14,688 107 21,693 0 302 0 341 61,515 217,001	15,322 122 19,362 0 318 1 326 62,834 207,270	15,210 162 20,578 0 307 0 416 64,461 217,132	18,605 158 25,445 0 318 1 546 83,389 246,521	22,255 229 28,411 0 307 3 802 109,536	24,311 309 31,441 0 271 1 750 122,272 266,151	25,407 297 31,800 0 350 2 938 123,039 280,920	20,470 244 24,790 0 293 1 762 99,179 248,928	13,841 177 17,352 0 303 0 522 81,164	11,855 160 17,178 0 293 0 194 73,957	12,406 117 16,828 0 303 1 232 65,185 200,037	16,475 168 22,139 0 311 1 464 79,773 225,870	
FPU FPU FPU FPU FTM FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small Total PGA Volumes Total Transport Volumes Total Billed Volumes To Be Allocated FRS	11,849 89 20,714 0 327 0 666 56,575 214,319 270,894	14,688 107 21,693 0 302 0 341 61,515 217,001	15,322 122 19,362 0 318 1 326 62,834 207,270 270,104 Transport 225,870	15,210 162 20,578 0 307 0 416 64,461 217,132	18,605 158 25,445 0 318 1 546 83,389 246,521	22,255 229 28,411 0 307 3 802 109,536	24,311 309 31,441 0 271 1 750 122,272 266,151	25,407 297 31,800 0 350 2 938 123,039 280,920	20,470 244 24,790 0 293 1 762 99,179 248,928	13,841 177 17,352 0 303 0 522 81,164	11,855 160 17,178 0 293 0 194 73,957	12,406 117 16,828 0 303 1 232 65,185 200,037	16,475 168 22,139 0 311 1 464 79,773 225,870 305,643	
FPU FPU FPU FTM FTM	FPU - GS - 2 FPU - CS - GS FPU - LVS FPU - IS FPU - GLS FT-Comm PA FT-Comm Small Total PGA Volumes Total Transport Volumes Total Billed Volumes To Be Allocated FRS	11,849 89 20,714 0 327 0 66 56,575 214,319 270,894	14,688 107 21,693 0 302 0 341 61,515 217,001 278,516	15,322 122 19,362 0 318 1 326 62,834 207,270 270,104	15,210 162 20,578 0 307 0 416 64,461 217,132	18,605 158 25,445 0 318 1 546 83,389 246,521	22,255 229 28,411 0 307 3 802 109,536	24,311 309 31,441 0 271 1 750 122,272 266,151	25,407 297 31,800 0 350 2 938 123,039 280,920	20,470 244 24,790 0 293 1 762 99,179 248,928	13,841 177 17,352 0 303 0 522 81,164	11,855 160 17,178 0 293 0 194 73,957	12,406 117 16,828 0 303 1 232 65,185 200,037	16,475 168 22,139 0 311 1 464 479,773 225,870 305,643 Docket No. Exhibit DMC-1	

Attachment 2

Table identifying the types of transportation costs for the selected items from Schedule D.

Contract Name	Type of Cost	Docket Number
Arden FPU AGL	Transportation costs resulting from the new firm transportation agreement contracting delivery of natural gas from PPC to FPUC.	20190127
Auburndale	Transportation costs resulting from the new firm transportation agreement contracting delivery of natural gas from PPC to CFG.	20190128
Western Palm Beach County (WPB)	Transportation costs resulting from the new firm transportation agreement contracting delivery of natural gas from PPC to FPUC.	20190127
Martin Riviera FPU FSEC	Transportation costs for natural gas delivered via the Florida Southeastern Connection (new pipeline in Florida) that serves as a bypass around constrained areas on the FGT line.	20190127
Emera Energy Services, Inc.	Emera is the asset manager for Nassau County, where FPUC pays Emera to remarket FPUC's unused capacity.	20190145
Marlin Gas Services LLC	Marlin is used as a supplier of compressed natural gas to customers in emergency and planned services. These costs have generally been borne by the PGA customers and since compressed natural gas also benefits transportation customers, swing allows these customers to share in these costs, lessening the burden on the PGA customers.	