Commissioners: Andrew Giles Fay, Chairman Art Graham Gary F. Clark Mike La Rosa Gabriella Passidomo

STATE OF FLORIDA

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

Public Service Commission

August 16, 2023

Beth Keating, Esq. Gunster Law Firm 215 South Monroe Street Suite 601 Tallahassee, Florida 32301 bkeating@gunster.com STAFF'S DATA REQUEST via e-mail

Re: 20230079-EI - Petition for approval of 2023 depreciation study by Florida Public Utilities Company.

Dear Ms. Keating:

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

- 1. Please refer to FPUC's 2023 Depreciation Study, Exhibit A, and clarify whether Account 303.1 Miscellaneous Intangible Plant 15 Yrs is both a jurisdictional and an amortizable depreciation account.
- 2. FPUC's Petition for Approval of 20[23] Depreciation Study, page 3, indicates that the Company is "asking to establish a new subaccount 303.2 with a 20-year amortization period for its CIS system." Please clarify, with explanation, whether the requested subaccount 303.2 Miscellaneous Intangible Plant 20 Yrs is both a jurisdictional and an amortizable depreciation account.
- 3. Please refer to FPUC's 2023 Depreciation Study, page 21, the second paragraph, for the questions below:
 - a. Please elaborate on "the amount of FPUC customization associated with OMS, PowerPlan, and UI Ph3."
 - b. Please explain in detail "how other Florida utilities treat software systems."
- 4. Referring to FPUC's 2023 Depreciation Study, page 21, the last paragraph, please explain in detail why the proposed new subaccount 303.2 should be amortized over a period of 20 years.

- 5. Please refer to FPUC's 2023 Depreciation Study, filed June 26, 2023. The asterisks below the table on page 20 reference the amortization for Miscellaneous Tangible Assets being addressed in a revenue rate proceeding. Please specify which rate proceeding is being referenced on this page.
- 6. Please refer to the Excel spreadsheet titled, "2023 Florida Electric Depreciation Study Workbook 6-25-23." On Tab Exh I, cells F48, F73, and F93 reference a "Variance." Please explain in detail the "Variance" referenced in those three cells.

Please file all responses electronically no later than September 6, 2023, 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) 413-6187 if you have any questions.

Sincerely,

/s/ Shaw Stiller Shaw Stiller Special Counsel

SPS/crv

cc: Office of Commission Clerk