

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition for establishment of regulatory assets for expenses not recovered during restoration for Hurricane Michael, by Florida Public Utilities

DOCKET NO.: 20190155-EI

In re: Petition for Limited Proceeding to Recover Incremental Storm Restoration Costs, Capital Costs, Revenue Reduction for Permanently Lost Customers, and Regulatory Assets related to Hurricane Michael by Florida Public Utilities Company.

DOCKET NO. 20190156-EI

FILED: September 5, 2019

Motion to Consolidate for Hearing Docket Nos. 20190155-EI and 20190156-EI

Pursuant to Rules 28-106.108 and 28-106.204, F.A.C., Citizens, by and through the Office of Public Counsel, hereby file their Motion to Consolidate for Hearing Docket Nos. 20190155-EI and 20190156-EI, and as grounds for states as follows:

- 1) On August 7, 2019, Florida Public Utilities Company (FPUC) filed its Petition for Limited Proceeding to Recover Incremental Storm Restoration Costs, Capital Costs, Revenue Reduction for Permanently Lost Customers and Regulatory Assets related to Hurricane Michael (Storm Petition), subsequently assigned Docket No. 20190156-EI. In conjunction with its Storm Petition, FPUC filed on August 7, 2019, its Petition for Establishment of Regulatory Assets for Expenses Not Recovered During Restoration for Hurricane Michael (Regulatory Asset Petition), subsequently assigned Docket No. 20190155-EI.
- 2) Both these Petitions address costs arising from the same event, Hurricane Michael, and FPUC's requested methods for collecting what they believe are storm costs eligible for recovery from customers.

- 3) In both the Storm Petition and the Regulatory Asset Petition, FPUC asks this Commission for permission to establish regulatory assets directly related to Hurricane Michael and storm damage. These regulatory assets are as follows:
- A) To recover the storm costs normally recovered through the storm reserve due to the Hurricane. Storm Petition p. 11;
 - B) To recover the “lost revenues” for 2018 and 2019 in the amount of \$563,128 due to the approximately 779 customers that FPUC alleges never returned to its system. Storm Petition p. 12, Regulatory Asset Petition pp. 5-6;
 - C) To recover “lost revenues” for normal Operation and Maintenance (O&M) expenses for October 2018 (all customers) and November 2018 (lighting customers only) in the amount of \$984,283 that FPUC alleges were largely “unrecovered” due to the Hurricane. Storm Petition pp. 3 and 12, Regulatory Asset Petition p. 4;
 - D) To recover the changes to accumulated depreciation in the amount of \$7,870,626 related to Hurricane Michael for losses on storm damaged assets, including net book value of retired assets and cost of removal net of salvage. Storm Petition p. 12, Regulatory Asset Petition p. 7.
- 4) OPC submits that the Storm Petition and Reserve Asset Petition are interrelated and contain many overlapping issues of fact and law and identical parties; therefore, the Commission should consolidate Docket Nos. 20190155-EI and 20190156-EI.
- 5) Moreover, consolidation of these dockets “would promote the just, speedy, and inexpensive resolution of the proceedings”¹ by allowing these interrelated issues to be

¹ See Rule 28-106.108

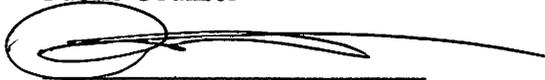
addressed efficiently such as in one set of intervener, staff, and rebuttal testimonies; thereby reducing costs and time. It would also allow the Commission to address these interrelated issues at a single hearing avoiding the additional cost of presenting witnesses multiple times to testify on the same issues. Further, consolidation of these dockets would not unduly prejudice the rights of the parties.

- 6) OPC has contacted the Company and FPUC does not oppose consolidation for purposes of administrative efficiency, including, should it be necessary, a hearing. Staff takes no position on the motion.

Wherefore, Citizens, by and through the Public Counsel, hereby request that the Commission grant this Motion to Consolidate for Hearing, Docket Nos. 20190155-EI and 20190156-EI.

Respectfully Submitted,

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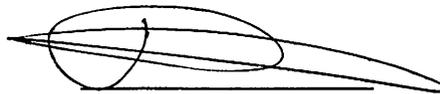
CERTIFICATE OF SERVICE
Docket No. 20190156-EI

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail on this 5th day of September 2019, to the following:

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