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STATE OF FLORIDA



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Public Service Commission

September 18, 2025

STAFF'S FIRST DATA REQUEST *via email*

Beth Keating, Esq.
Gunster, Yoakley & Stewart, P.A.
215 South Monroe Street, Suite 601
Tallahassee, Florida 32301
bkeating@gunster.com

Michelle D. Napier
Director, Reg. Affairs Distribution
Florida Public Utilities Company
1635 Meathe Drive
West Palm Beach, FL 33411
mnapier@fpuc.com

RE: Docket No. 20250107-GU - Petition for approval of swing service rider rates for January through December 2026, by Florida Public Utilities Company.

Dear Ms. Keating and Ms. Napier:

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

Please refer to Schedule D of Exhibit DW-1 within Document No. 08618-2025 from Docket 20250107-GU and Schedule D of Exhibit SKL-1 within Document No. 08815-2024 from Docket No. 20240135-GU for the following questions:

1. Please explain why the following actual costs from the period of 7/1/2023-6/30/2024 have been discontinued: Cavanaugh and Associates and Payroll Allocation. Please state the dates on which the aforementioned services were discontinued.
2. Please explain the addition of the Nassau County TECO cost of \$335,000 in 2024/2025 and provide a description of the services Nassau County TECO provides to FPUC. Please explain how this is separate from Nassau County William Burgess and Nassau County.
3. Please explain the addition of the BP RNG cost of \$216,321 in 2024/2025 and provide a description of the services BP RNG provides to FPUC.

4. Please explain the addition of the Company Use cost to \$1,170 in 2024/2025 and provide a description of what Company Use entails for FPUC.
5. Please explain the addition of the Admin Payroll cost of \$40,332 in 2024/2025 and provide a description of the differences between this line and the Payroll Allocation line from 2023/2024 that went from \$3,726 to \$0 in 2024/2025.
6. Please explain the reasons for the Hernando County CFG TECO change from \$8,851 in 2023/2024 to \$10,574 in 2024/2025 and provide a description of the services Hernando County CFG TECO provides to FPUC.

The questions below refer to services that have been discussed in prior responses to staff data requests. Please also refer to Schedule D of Exhibit DW-1 within Document No. 08618-2025 from Docket 20250107-GU and Schedule D of Exhibit SKL-1 within Document No. 08815-2024 from Docket No. 20240135-GU for the following questions:

7. Please explain the reasons for the Arden FPU AGL change from \$29,265 in 2023/2024 to \$20,264 in 2024/2025.
8. Please explain the reasons for the Martin Riviera FPU FSEC change from \$342,786 in 2023/2024 to \$340,665 in 2024/2025.
9. Please explain the reasons for the Gunster Yoakley & Stewart change from \$9,401 in 2023/2024 to \$4,595 in 2024/2025.
10. Please explain the reasons for the S & P Global Platts change from \$55,999 in 2023/2024 to \$52,400 in 2024/2025.
11. Please explain the reasons for the Snell & Wilmer LLP change from \$78,373 in 2023/2024 to \$32,075 in 2024/2025.
12. Please explain the reasons for the Baker & Hostetler LLP change from \$2,814 in 2023/2024 to \$107 in 2024/2025.
13. Please explain the reasons for the Convergence Solutions LLC change from \$195,960 in 2023/2024 to \$91,540 in 2024/2025.
14. Please explain the reasons for the Emera Energy Services Inc. change from \$1,148,544 in 2023/2024 to \$1,192,295 in 2024/2025.
15. Please explain the reasons for the Marlin Gas Services LLC change from \$2,621,162 in 2023/2024 to \$2,724,308 in 2024/2025.
16. Please explain the reasons for the Pierpont & McLelland change from \$70,642 in 2023/2024 to \$92,783 in 2024/2025.

17. Please explain the reasons for the Peninsula Pipeline change from \$25,429,013 in 2023/2024 to \$32,360,718 in 2024/2025.
18. For the previously described services above, please confirm that the general explanation of what they do for FPUC has not changed. If any have changed, please provide a new description of the services that company provides for FPUC.

Please file all responses electronically no later than October 1, 2025, through the Commission's website at www.floridapsc.com, by selecting the Clerk's Office tab and Electronic Filing Web Form. *In addition, please email the filed response to discovery-gcl@psc.state.fl.us.*

Please feel free to call me at (850) 413-6524 if you have any questions.

Sincerely,

/s/ Zachary Bloom
Zachary Bloom
Attorney

ZB/ds

cc: Office of Commission Clerk