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STATE OF FLORIDA



DIVISION OF ECONOMICS  
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# Public Service Commission

September 22, 2025

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

## STAFF'S FIRST DATA REQUEST VIA-EMAIL

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

**Re: Docket No. 20250109-GU: Petition for approval of gas utility access and replacement directive cost recovery factors for January 2026 through December 2026, by Florida Public Utilities Company**

Dear Ms. Keating & Ms. Napier:

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

- 1) Referring to paragraph 8 of the petition filed on September 2, 2025, please explain why the Company was unable to provide seven months of actual data in the current petition when the 2024 GUARD petition filed on September 3, 2024 contained seven months of actual data.
- 2) Regarding the six months of actual and six months of projected data provided in the current petition, please state if this change is only for the 2025 filing or if the future GUARD filings will also contain six months actual and six months projected data.
- 3) Paragraph 9 of the petition states that the "total projected GUARD true-up to be refunded to customers in 2026 is a net under-recovery of \$42,599, inclusive of interest" while the testimony of witness Dayton on page 3 of 5 states that the "total net under-recovery to be collected for FPUC is \$42,599." Please correct the discrepancy.

- 4) Referring to Schedule F-1 (Exhibit BD-1), lines 36 and 37 of the Excel file, please explain why Sanford Phase 1 and Winter Springs Phase 2 completed in quarters 2 and 4 of 2024 are listed as being “in progress”.
- 5) With reference to FPUC witness Dayton’s testimony on page 4 of 5, lines 1-2, please provide a detailed discussion how FPUC prioritizes its replacement projects and ensures that they are completed in a cost effective manner.
- 6) If the Company relies on the DIMP plan, please provide any relevant pages from the DIMP plan that support the replacement projects planned for 2026.
- 7) Please provide a discussion on whether the FPUC uses in-house or contract labor to complete the replacement projects and what criteria that decision is based on.
- 8) If FPUC uses contract labor, please discuss controls to ensure the payments for contract labor are reasonable.
- 9) Please provide a discussion how FPUC purchases the replacement materials and ensures that they are purchased in a cost effective manner.

Please file all responses electronically no later than October 6, 2025 via the Commission’s website at [www.floridapsc.com](http://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](mailto:discovery-gcl@psc.state.fl.us) and add this email address on the service list block associated with the PSC attorney assigned to this docket. If you have any questions, please contact me at [sguffey@psc.state.fl.us](mailto:sguffey@psc.state.fl.us) or at 850.413.6204.

Thank you,

*/s/Sevini Guffey*  
Sevini Guffey  
Public Utility Analyst IV

cc: Office of the Commission Clerk