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October 1, 2025

VIA E-PORTAL

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

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

Dear Mr. Teitzman:

Attached for filing in the above-referenced docket, please find Florida Public Utilities Company's Responses to Staff's First Set of Data Requests.

Thank you for your assistance with this filing. As always, please don't hesitate to let me know if you have any questions whatsoever.

Sincerely,



Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301

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

Florida Public Utilities Company's Responses to Staff's First 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.

Company Response

The company used Cavanaugh and Assoc for various consulting services that came to completion in 2023. The Payroll allocation is relabeled Admin Payroll and it was \$40,322 in 2024/2025.

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.

Company Response

Transco Zone 5 index represents the prevailing price index for the natural gas FPUC procures for its operations in Nassau County. Peoples Gas provides FPUC firm transportation capacity service for a limited duration, for a fixed monthly reservation fee (which is cumulatively \$335,000 over the term) that allows FPUC access to potentially cheaper, less volatile and more liquid gas supply at an alternate receipt location, FGT Zone 3. This capacity is on the Peoples Gas System with firm receipt rights from FGT/PGS-Jacksonville to the PGS-Callahan Pipeline Interconnect as compared to the William Burgess line that has receipt point rights at Radio Road and delivers into the FPU distribution system.

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.

Company Response

FPUC entered into an agreement with BP to buy Renewable Natural Gas or RNG that has been stripped of its environmental attributes. The gas supply is purchased at prevailing commodity market index pricing.

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.

Company Response

The company uses natural gas at its various office location and therefore passing some of these costs to transportation customers.

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.

Company Response

The Admin Payroll is not an addition. It represents the same expenses as the Payroll Allocation line from 2023/2024. The payroll allocation and Admin Payroll is for the employees in the regulatory department and reflects an entire year for the 2024/2025 timeframe. The employees gather and prepare the monthly and annual filings related to this clause and were not included in the company's base rates.

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.

Company Response

The monthly demand charge billed by TECO has increased year over year. This service is for an interconnect with our Citrus County system and is used mainly for emergency backup in the event of a line cut that serves several customers.

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.

Company Response

Actual costs for Arden FPU AGL in 2024/2025 are \$10,264. The increase in costs in prior year was due to Florida City Gas reclassifying FPUC's customer pool to a new rate class due to increased demand, therefore increasing the cost for 2023/2024. This is an FCG line providing transport service to FPUC's Arden area.

8. Please explain the reasons for the Martin Riviera FPU FSEC change from \$342,786 in 2023/2024 to \$340,665 in 2024/2025.

Company Response

The Martin Riviera FPU FSEC is the reservation/demand charges associated with the Florida Southeast Connection LLC pipeline used to serve customers in Martin County. These costs vary by month depending on the quantity of gas transported.

9. Please explain the reasons for the Gunster Yoakley & Stewart change from \$9,401 in 2023/2024 to \$4,595 in 2024/2025.

Company Response

The costs are related to the legal consulting services provided by Gunster, Yoakley & Stewart, P.A. for RNG and contracts and/or tariffs related to transportation. These costs vary depending on level of service required each year.

10. Please explain the reasons for the S & P Global Platts change from \$55,999 in 2023/2024 to \$52,400 in 2024/2025.

Company Response

S&P Global Platts provides information and data about natural gas markets, which include monthly and daily gas price settlements for geographic locations that are used for the utilities transactions. The departmental cost allocation had a slight change in 2024/2025 and therefore the cost allocated to FPUC slightly decreased.

11. Please explain the reasons for the Snell & Wilmer LLP change from \$78,373 in 2023/2024 to \$32,075 in 2024/2025.

Company Response

The costs are related to Snell & Wilmer's representing FPUC in the FGT Rate Case. The decrease in costs for Snell & Wilmer LLP are due to decreased involvement in the FGT Rate case.

12. Please explain the reasons for the Baker & Hostetler LLP change from \$2,814 in 2023/2024 to \$107 in 2024/2025.

Company Response

Baker & Hostetler provides legal and professional services on general contract matters, technical research regarding gas prepayment opportunities, multiple contract assignments and operation balancing agreements with Gulfstream. These costs vary depending on level of service required each year.

13. Please explain the reasons for the Convergence Solutions LLC change from \$195,960 in 2023/2024 to \$91,540 in 2024/2025.

Company Response

Convergence is the software provider for the Company's gas management system and provides cloud hosting services for the Company's gas tracking system.

The decrease is due to the reclassification of the system enhancements services provided in 2023/2024 to capital expenditures in amount of \$58,460.00. The enhancements included 1) enhancements to monthly imbalances for pools by month, 2) month end billing reports & monthly cash out by pool manager, and 3) customer info exceptions report.

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.

Company Response

Emera Energy Services provides asset management of the capacity and commodity in Nassau County, Florida. The increase in cost is due to the higher volatility in the commodity market during 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.

Company Response

Marlin is used to bring supply to areas as a virtual pipeline for emergency and planned services. These activities vary depending on the event and the commodity supplied during the period.

16. Please explain the reasons for the Pierpont & McLelland change from \$70,642 in 2023/2024 to \$92,783 in 2024/2025.

Company Response

Pierpont & McLelland provide consulting for load forecasting, transportation tariff consolidation/modifications, interstate and intrastate transportation opportunities, general consultation regarding current customers and other business opportunities within the state. The amount of activity in these matters fluctuates from year to year depending upon the initiatives of the company.

17. Please explain the reasons for the Peninsula Pipeline change from \$25,429,013 in 2023/2024 to \$32,360,718 in 2024/2025.

Company Response

Peninsula pipeline provides gas transportation services to FPUC. The overall increase year-over-year is attributable to new PPC projects becoming operational 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.

Company Response

The services provided in the explanation above has not changed since the previous filings.