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August 22, 2024

BY E-FILING

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

Re: Docket No. 20240099-EI - Petition for rate increase by Florida Public Utilities Company

Dear Mr. Teitzman:

Attached, for electronic filing, on behalf of Florida Public Utilities Company, please find the Testimony and Exhibit of Wraye Grimard.

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

(Document 10 of 18)

Sincerely,

A handwritten signature in cursive script that reads 'Beth Keating'.

Beth Keating
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1706

1 Before the Florida Public Service Commission

2 Docket No. 20240099-EI: Petition for rate increase by Florida Public Utilities Company

3 Prepared Direct Testimony of Wraye Grimard

4 Filed: August 22, 2024

5

6 **Q. Please state your name, business address, and occupation.**

7 A. My name is Wraye Grimard. My business address is 3879 East Eagle Trail, Hernando,
8 Florida 34442. I work for Pierpont and McLelland, LLC. I have provided consulting,
9 regulatory, and tariff support for Florida Public Utilities Company (“FPUC” or
10 “Company”) since May 2017.

11 **Q. Please describe your professional experience.**

12 A. I have over forty years of experience in the energy industry with a focus on federal
13 and state regulatory, rates, and tariff matters. Prior to retiring in 2017, I worked for
14 TECO Energy (“TECO”). At TECO, I was responsible for developing and managing
15 SeaCoast pipeline’s intrastate pipeline services and regulatory matters, as well as
16 TECO’s subsidiary, Peoples Gas System’s (“PGS”) transportation service programs.
17 I oversaw and managed the evolution of PGS’s operating tariffs since 2000. I have
18 testified before the Florida Public Service Commission (“FPSC”) for several matters
19 related to fuel clause filings, tariff modification requests, and in rate case filings. Since
20 2017, I have consulted and participated in the modification and consolidation of the
21 Company’s four natural gas operating tariffs.

22 **Q. What is the purpose of your testimony in this proceeding?**

23 A. The purpose of my testimony is to present and support the tariff modifications
24 proposed as part of the Company’s rate case filing. My testimony will describe the

1 proposed modifications to i) the Company's Miscellaneous Service Charges, ii) rate
2 schedules, iii) certain customer riders, and v) non-rate related tariff changes proposed
3 by the Company in this proceeding.

4 **Q. Are you sponsoring any exhibits in this proceeding?**

5 A. Yes. I am sponsoring Exhibit No. WG-1, which is a comparison of the Company's
6 current and proposed Miscellaneous Service Charges. I am also sponsoring minimum
7 filing requirement ("MFR") Schedule E-13b, which is the derivation of the individual
8 of each Miscellaneous Service Charge, as well as MFR Schedule E-14, which is both
9 the complete proposed Tariff Volume 1 (the "clean tariff") and the legislative (red-
10 line) version of the tariff. These exhibits were prepared by me or under my direction.

11 **TARIFF FORMAT**

12 **Q. Please describe the format changes made to the tariff.**

13 A. The proposed tariff has been reformatted to provide breaks and section numbers for
14 the applicable sections. For instance, the Technical Terms and Abbreviations, Rules
15 and Regulations, and Rate Schedule sections have been assigned section numbers
16 5.000, 6.000, and 7.000, respectively.

17 **MISCELLANEOUS SERVICE CHARGES**

18 **Q. Please describe the proposed changes to the Company's Miscellaneous Service**
19 **Charges.**

20 A. In general, the Company is proposing increases to each of its existing tariff
21 Miscellaneous Service Charges. Exhibit No. (WG-1) provides a comparison of the
22 Company's current and proposed Miscellaneous Service Charges. As outlined in the
23 Company's MFRs, a cost-of-service study was performed using operations, customer

1 service, and accounting data to determine the Company's cost to provide each service
2 for which a Miscellaneous Service Charge was proposed. The Company is not
3 proposing changes to the returned check charge (that is established by Florida Statute)
4 or the late payment charge.

5 **Q. Is the Company proposing any new Miscellaneous Service Charges?**

6 A. No.

7 **RATE SERVICE CHANGES**

8 **Q. Is the Company proposing to revise its tariff consistent with the rate**
9 **modifications?**

10 A. Yes. Consistent with the rate design sponsored by Witness Taylor, the Company has
11 made proposed rate adjustments. The Company is submitting proposed revisions to its
12 tariff as required in both legislative (red-lined) and final format. See MFR Schedule
13 E-14.

14 **Q. Please describe the changes to the Company's rate schedules.**

15 A. The Company has recalculated its base rates and the associated rate schedules have
16 been modified to include the Company's proposed base rates.

17 **Q. Are there any other changes?**

18 A. Yes, as described in the testimony of Witness Haffecke, the Company is proposing to
19 close one of its under-utilized rate classes, the Standby Service tariff. In addition, the
20 Company is proposing to close the Non-Firm Energy Program (Experimental)
21 schedule due to the lack of use as well. This is also described in Witness Haffecke's
22 testimony.

23

1 **CLAUSES AND SURCHARGES**

2 **Q. Is the Company proposing to introduce any new customer riders?**

3 Technology Rider

4 A. Yes. The Company is proposing a new rider that is designed to recover technology
5 costs. The details of the Technology Cost Recovery Rider can be found in Witness
6 Napier's testimony.

7 **NON-RATE RELATED TARIFF CHANGES**

8 **Q. Please describe changes to non-rate related tariff language requested by the**
9 **Company in this docket.**

10 A. Underground Cost Differential

11 The Company proposes to modify the existing underground cost differential language
12 consistent with Section 25-6.115 of the Florida Administrative Code.

13 **MINOR REVISIONS**

14 **Q. Briefly describe changes to the tariff the Company characterizes as editorial,**
15 **corrections, and clarifications.**

16 A. Specifically, the Company has reformatted the headers and footers on each tariff page
17 to break each tariff section into a numerical sequence. This will enable the Company
18 to make future changes to the tariff and to renumber the tariff sheets more efficiently.

19 **Q. In your opinion, are the Company's proposed changes to the miscellaneous rates,**
20 **clauses and surcharges just and reasonable?**

21 A. Yes. The rates modifications proposed by the Company are just and reasonable and
22 result in each customer moving toward a more uniform contribution to costs associated
23 with providing the service(s) requested.

1 **Q. Does this conclude your testimony?**

2 A. Yes.

Comparison of Current and Proposed Miscellaneous Service Charges

Florida Public Utilities		
Service	Current	Proposed
Initial establishment of service	\$61	\$125
Re-establish or Change Account	\$26	\$45
Temporary Disconnect then Reconnect	\$65	\$81
Reconnect service after being disconnected For rule violation		
Normal Business Hours	\$52	\$70
After Normal Business Hours	\$178	\$325
Connect and then disconnect Temporary Service	\$85	\$135
Collection Charge	\$16	\$50
Late Payment Charge	No change	No change
Returned Check Charge	No change	No change

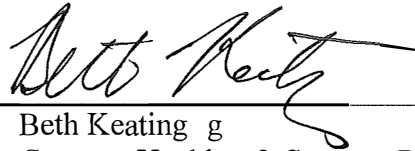
Docket No. 20240099-EI
Florida Public Utilities

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing filing has been served by Electronic Mail this 22nd day of August, 2024, upon the following:

Walter Trierweiler, Public Counsel
Office of the Public Counsel
c/o The Florida Legislature
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Tallahassee, FL 32399-1400
Trierweiler. walt@leg.state.fl.us

By: _____



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