# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment (PGA) true-up. DOCKET NO. 080003-GU DATED: OCTOBER 10, 2008

## STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-08-0169-PCO-GU, filed March 20, 2008, and Order No. PSC-08-0362-PCO-GU, filed May 30, 2008, the Staff of the Florida Public Service Commission files its Prehearing Statement.

All Known Witnesses a.

Staff does not intend to call any witnesses.

b. All Known Exhibits

Staff does not intend to sponsor any exhibits, but reserves the right to use exhibits for the purpose of cross-examination.

Staff's Statement of Basic Position c.

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

- d. Staff's Position on the Issues
- **ISSUE 1:** What are the final purchased gas adjustment true-up amounts for the period January 2007 through December 2007?

#### **POSITION:**

Florida City Gas	\$719,773	Overrecovery	
Florida Public Utilities	\$2,339,141	Underrecovery	
<b>COM</b> S Peoples Gas System, Inc.	\$2,129,695	Underrecovery	
ECR St. Joe Natural Gas Company	\$11,809	Overrecovery	
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**<u>ISSUE 2</u>**: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2008 through December 2008?

### **POSITION:**

Florida City Gas	\$349,603	Overrecovery
Florida Public Utilities	\$3,273,997	Overrecovery
Peoples Gas System, Inc.	\$2,578,283	Overrecovery
St. Joe Natural Gas Company	\$8,718	Overrecovery

**<u>ISSUE 3</u>**: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2009 through December 2009?

### POSITION:

Florida City Gas	\$1,069,376	Overrecovery
Florida Public Utilities	\$934,856	Overrecovery
Peoples Gas System, Inc.	\$448,588	Overrecovery
St. Joe Natural Gas Company	\$20,527	Overrecovery

**<u>ISSUE 4</u>**: What are the levelized purchased gas cost recovery (cap) factors for the period January 2009 through December 2009?

#### POSITION:

Florida City Gas	140.474 cents per therm
Florida Public Utilities	158.107 cents per therm
Peoples Gas System, Inc.	151.426 cents per therm
St. Joe Natural Gas Company	122.100 cents per therm

- **<u>ISSUE 5</u>**: What should be the effective date of the new purchased gas adjustment charge for billing purposes?
- **POSITION:** The factor should be effective for all meter readings on or after January 1, 2009, beginning with the first or applicable billing cycle for the period January 2009 through December 2009.

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e. <u>Stipulated Issues</u>

Staff is not aware of any stipulated issues at this time.

f. <u>Pending Motions</u>

Staff has no pending motions at this time.

## g. <u>Pending Confidentiality Claims or Requests</u>

Staff has no pending confidentiality claims or requests at this time.

h. Objections to Witness Qualifications as an Expert

Staff has no objections to any witness' qualifications as an expert in this proceeding.

i. Compliance with Order Nos. PSC-08-0169-PCO-GU and PSC-08-0362-PCO-GU

Staff has complied with all requirements of the Orders Establishing Procedure entered in this docket.

Respectfully submitted this 10th day of October, 2008.

KATHERINE E. FOEMING Senior Attorney FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850 (850) 413-6218

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### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of STAFF'S PREHEARING

STATEMENT has been furnished to the following by electronic and U.S. mail this 10th day of

October, 2008:

Elizabeth Wade/Melvin Williams AGL Resources Inc. Ten Peachtree Place Location 1470 Atlanta, GA 30309

Jay Sutton Florida City Gas 4180 South U.S. Highway 1 Rockledge, FL 32955-5309

Cheryl M. Martin Florida Public Utilities Company P.O. Box 3395 West Palm Beach, FL 33402-3395

Paula Brown Regulatory Affairs Peoples Gas System P.O. Box 111 Tampa, FL 33601-0111 Beth Keating Akerman Senterfitt 106 East College Avenue, Suite 1200 Tallahassee, FL 32301

Charles A. Costin Costin and Costin Law Firm Post Office Box 98 Port Saint Joe, FL 32457-0098

Ansley Watson, Jr. MacFarlane, Ferguson & McMullen P.O. Box 1531 Tampa, FL 33601-1531

Norman H. Horton, Jr. Messer, Caparello & Self, P.A. Post Office Box 15579 Tallahassee, FL 32317 CERTIFICATE OF SERVICE DOCKET NO. 080003-GU PAGE 2

Matthew R. Costa TECO Energy, Inc. P. O. Box 111 Tampa, FL 33601-0111 Office of Public Counsel J.R. Kelly/P. Christensen c/o The Florida Legislature 111 W. Madison Street, Room 812 Tallahassee, FL 32399-1400

St. Joe Natural Gas Company, Inc. Stuart L. Shoaf P. O. Box 549 Port St. Joe, FL 32457-0549

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