

**Diamond Williams**

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**From:** Keating, Beth [BKeating@gunster.com]  
**Sent:** Wednesday, October 12, 2011 1:39 PM  
**To:** Filings@psc.state.fl.us  
**Cc:** Jennifer Crawford  
**Subject:** Docket No. 110003-GU  
**Attachments:** 20111012131321333.pdf; Prehearing Statement PGA 2011.DOC

Attached for electronic filing, please find the Florida City Gas Company's Prehearing Statement. Please don't hesitate to contact me if you have any questions.

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a. Person responsible for this electronic filing:

Beth Keating  
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b. Docket No. 110003-GU - In re: Purchased Gas Adjustment (PGA) True-Up.

c. On behalf of: Florida City Gas

d. There are a total of pdf file: 5 pages.  
Word file: 4 pages.

e. Description: Prehearing Statement

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October 12, 2011

**VIA ELECTRONIC FILING - FILINGS@PSC.STATE.FL.US**

Ms. Ann Cole  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

Re: Docket No. 110003-GU – Purchased Gas Adjustment (PGA) True Up.

Dear Ms. Cole:

Attached for electronic filing, please find Florida City Gas's Prehearing Statement in the referenced docket. Also attached is a copy of the Prehearing Statement in Word format.

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

Sincerely,

Beth Keating  
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MEK

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**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Purchased Gas Adjustment )  
(PGA) True-up )  
\_\_\_\_\_ )

Docket No. 110003-GU

Filed: October 12, 2011

**FLORIDA CITY GAS COMPANY'S  
PREHEARING STATEMENT**

Pursuant to the requirements of the Order on Procedure, Order No. PSC-11-0120-PCO-GU, Florida City Gas hereby submits its Prehearing Statement.

**A. Known Witnesses**

Florida City Gas intends to offer the amended 2010 true-up testimony of Thomas Kaufmann, as amended on August 1, 2011, as well as the amended true-up factor testimony of Mr. Kaufmann, as amended October 4, 2011.

Thomas Kaufmann                      Issues 1-6

**B. Known Exhibits**

Florida City Gas intends to sponsor the following exhibits:

Kaufmann	TK-1 <sup>1</sup>	Final Fuel Over/Under Recovery (Schedule A-7)
	TK-2 <sup>2</sup>	Schedules E-1 Winter, E-1, E-1/R, E-2, E-3, E-4, E-5

**C. Basic Position**

Florida City Gas has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-6.

**D. – F. Issues**

Florida City Gas' position on the issues identified by Staff are as follows:

<sup>1</sup> Amended August 1, 2011.

<sup>2</sup> Amended October 4, 2011.

**Issue 1:** What are the final purchased gas adjustment true-up amounts for the period January 2010 through December 2010?

**Florida City Gas:** An under-recovery of \$259,865.

**Issue 2:** What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2011 through December 2011?

**Florida City Gas:** An over-recovery of \$357,639.

**Issue 3:** What are the total purchased gas adjustment true-up amounts to be collected during the period January 2012 through December 2012?

**Florida City Gas:** An over-recovery of \$97,774 for a true-up refund factor of 0.227 cents per therm.

**Issue 4:** What are the appropriate levelized purchased gas cost recovery (cap) factors for the period January 2012 through December 2012?

**Florida City Gas:** Based on the winter months of October through March the appropriate (cap) factors are, 81.634 cents per therm (before the regulatory assessment fee) or 82.045 cents per therm (with the regulatory assessment fee).

**Issue 5:** What should be the effective date of the new purchased gas adjustment charge for billing purposes?

**Florida City Gas:** The factors should be effective for all meter readings on or after January 1, 2012 and should apply for bills rendered for meter readings taken between January 1, 2012 and December 31, 2012.

**Issue 6:** What changes, if any, should be made to improve the reporting mechanism related to monthly PGA reporting as established in Order No. 24463?

**Florida City Gas:** FCG states that the current mechanism has not caused any problems for FCG. However, FCG would not oppose the changes suggested in Staff's Preliminary Statement of Issues and Positions. In taking this position, FCG assumes that the adjustments to schedule A-5 proposed by Commission Staff would be to keep each month on the schedule, instead of showing only the current month and YTD totals/average.

G. Stipulated Issues

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

H. Pending Motions

None at this time.

I. Pending Confidentiality Requests

Request for Confidentiality submitted August 9, 2011.

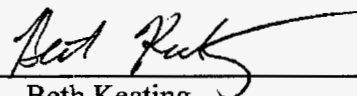
J. Compliance With Order on Procedure

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

K. Objections to Witness Qualifications

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 12th day of October, 2011.



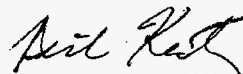
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic mail or U.S. Mail\* to the following parties of record this 12th day of October, 2011:

Florida Public Utilities Company Thomas A. Geoffroy P.O. Box 3395 West Palm Beach, FL 33402-3395	MacFarlane Ferguson Law Firm Ansley Watson, Jr. P.O. Box 1531 Tampa, FL 33601-1531
Charles A. Costin * Costin and Costin Law Firm P.O. Box 98 Port Saint Joe, FL 32457-1159	Office of Public Counsel J.R. Kelly/Patricia Christensen c/o The Florida Legislature 111 West Madison Street Room 812 Tallahassee, FL 32399-1400
People Gas System Paula Brown P.O. Box 111 Tampa, FL 33601-0111	St. Joe Natural Gas Company, Inc. Mr. Stuart L. Shoaf P.O. Box 549 Port St. Joe, FL 32457-0549
TECO Energy, Inc. Javier Cuebas P.O. Box 111 Tampa, FL 33601-0111	AGL Resources Inc. Elizabeth Wade/David Weaver Ten Peachtree Place Location 1470 Atlanta, GA 30309
Florida City Gas Melvin Williams 933 East 25 <sup>th</sup> Street Hialeah, FL 33013-3498	Jennifer Crawford Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399



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