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IN REPLY REFER TO:

August 22, 2014

## VIA WEB-BASED E-FILING

Ms. Carlotta S. Stauffer
Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

## Re: Docket No. 140003-GU - Purchased gas adjustment (PGA) true-up

Dear Ms. Stauffer:
Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find the following:

- Peoples' Petition for Approval of PGA Factor For Application To Bills To Be Rendered During The Period January 2015 Through December 2015;
- Direct Testimony of Kandi M. Floyd; and
- Composite Exhibit_ (KMF-2), consisting of Schedules E-1 through E-5 of the prescribed reporting forms.

The direct testimony of Ms. Floyd and the referenced exhibit will be offered by Peoples at the hearing in this docket currently scheduled to commence on October 22, 2014. We appreciate your usual assistance.


ARK/aw
Attachments

Carlotta S. Stauffer, Commission Clerk
August 22, 2014
Page 2
cc: Parties of Record
Ms. Kandi M. Floyd

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment (PGA) true-up.

DOCKET NO. 140003-GU
Submitted for filing:
8-22-14

## PETITION OF PEOPLES GAS SYSTEM FOR APPROVAL OF PGA FACTOR FOR APPLICATION TO BILLS TO BE RENDERED DURING THE PERIOD JANUARY 2015 THROUGH DECEMBER 2015

Peoples Gas System ("Peoples"), by its undersigned attorneys, hereby files its petition for approval of its purchased gas adjustment ("PGA") factor to be applied to bills beginning the first billing cycle in January 2015 through the last billing cycle in December 2015, inclusive, and in support thereof says:

1. The name of the petitioner and the mailing address of its principal office are:

Peoples Gas System
P.O. Box 2562

Tampa, Florida 33601-2562
2. The names and mailing address of the persons authorized to receive notices and communications with respect to this petition are:

Andrew M. Brown
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P. O. Box 1531

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Ms. Paula K. Brown
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Ms. Kandi M. Floyd
Manager - State Regulatory
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Tampa, Florida 33601-2562
3. By its Orders Nos. 24463 and 24463-A in this docket, the Commission adopted a revised method for the recovery of purchased gas costs by regulated natural gas
utilities, to be used for the recovery of such costs commencing October 1, 1991. Submitted herewith is Peoples' Composite Exhibit KMF-2, consisting of Schedules E-1, E$1 / \mathrm{R}, \mathrm{E}-2, \mathrm{E}-3, \mathrm{E}-4$ and $\mathrm{E}-5$. The schedules in Composite Exhibit KMF-2 are used to compute a maximum PGA factor for application to bills rendered for gas sold by Peoples during the twelve-month period of January 2015 through December 2015 (the "Projection Period").
4. The maximum PGA factor calculated in Composite Exhibit KMF-2 basically represents $(A)$ the sum of the final net true-up amount for the period January 1, 2013 through December 31, 2013, the estimated or projected true-up (based on actual data for seven months and projected data for five months) for the period January 1, 2014 through December 31, 2014, both true-up amounts including interest, and Peoples' projected cost of purchased gas for the Projection Period, without interest, (B) divided by Peoples' projected therm sales for the Projection Period.
5. By its Order No. PSC-99-0634-FOF-GU in Docket No. 981698-GU the Commission approved a methodology for charging separate Purchased Gas Adjustment Factors for different customer classes. The maximum (cap) PGA factor for which Peoples seeks approval for the Projection Period is the Residential factor shown on Line 45, Page 2 of Schedule E-1 of Composite Exhibit KMF-2, and is $\$ .98354$ per therm.

WHEREFORE, Peoples Gas System respectfully requests that the Commission enter its order approving Peoples' proposed maximum (cap) PGA factor of $\$ .98354$ per therm for application to bills beginning the first billing cycle in January 2015 through the last billing cycle in December 2015.

Respectfully submitted,


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## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing petition, together with copies of the Direct Testimony of Kandi M. Floyd and Composite Exhibit __ (KMF-2), have been furnished by electronic mail, this 22nd day of August, 2014, to the foilowing:

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BEFORE THE<br>FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 140003-GU PURCHASED GAS ADJUSTMENT (PGA) BY PEOPLES GAS SYSTEM

TESTIMONY AND EXHIBIT OF

KANDI M. FLOYD

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION PREPARED DIRECT TESTIMONY <br> OF 

KANDI M. FLOYD
Q. Please state your name, business address, by whom you are employed, and in what capacity?
A. My name is Kandi M. Floyd. My business address is Peoples Gas System, 702 North Franklin Street, P.O. Box 2562, Tampa, Florida 33601-2562. I am employed by Peoples Gas System ("Peoples" or the "Company") and am the Manager of State Regulatory.
Q. Please describe your educational and employment background.
A. I have a Bachelor of Arts Degree in Business Administration from Saint Leo University. From 1995 to 1997, I was employed in a series of positions within the regulatory affairs department of Tampa Electric Company. In 1998, I joined Peoples Gas System as a Regulatory Coordinator in the Regulatory and Gas Supply Department. In 2001, I became the Energy Conservation / Regulatory Administrator and in 2003 became the Manager of State

Regulatory for Peoples Gas System. In this role, I am responsible for managing the Purchased Gas Adjustment ("PGA") and Energy Conservation Cost Recovery filings as well as various regulatory activities for Peoples.
Q. What is the purpose of your testimony in this docket?
A. The purpose of my testimony is to describe generally the components of Peoples' cost of purchased gas and upstream pipeline capacity. In my testimony, I also explain how Peoples' projected weighted average cost of gas ("WACOG") for the January 2015 through December 2015 period was determined and the resulting requested maximum PGA ("Cap").
Q. Please summarize your testimony.
A. I will address the following areas:

1. How Peoples will obtain its gas supplies during the projected period.
2. Estimates and adjustments used to determine the amount of gas to be purchased from Peoples' various available sources of supply during the projected period. 3. Projections and assumptions used to estimate the
purchase price to be paid by Peoples for such gas supplies.
3. The components and assumptions used to develop Peoples' projected WACOG including the projected true-up balance to be collected or refunded.
Q. What is the appropriate final purchased gas adjustment true-up amount for the period January 2013 through December 2013?
A. The final PGA true-up amount for the year 2013 is an under-recovery of $\$ 3,036,213$.
Q. What is the estimated purchased gas adjustment true-up amount for the period January 2014 through December 2014?
A. The estimated PGA true-up amount for 2014 is an overrecovery of $\$ 3,655,983$.
Q. What is the total purchased gas adjustment true-up amount to be refunded during the period January 2015 through December 2015?
A. The total PGA true-up amount to be refunded in 2015 is
an over-recovery of \$619,770.
Q. Have you prepared or caused to be prepared certain schedules for use in this proceeding?
A. Yes. Composite Exhibit KMF-2 was prepared by me or under my supervision.
Q. Please describe how Peoples will obtain its gas supplies during the projected period of January 2015 through December 2015.
A. All natural gas delivered through Peoples' distribution system is received through three interstate pipelines. Gas is delivered through Florida Gas Transmission Company ("FGT"), through Southern Natural Gas Company ("Southern") in Peoples' Jacksonville Division, and through Gulfstream Natural Gas System ("Gulfstream") in Peoples' Lakeland, Tampa, Sarasota, and Orlando Divisions. Receiving gas supply through multiple interstate pipelines provides valuable flexibility and reliability to serve customers.
Q. In general, how does Peoples determine its sources of supply?
A. Peoples evaluates, selects and utilizes sources of natural gas supply on the basis of its "best value" gas acquisition strategy. For a source of supply to be identified as a "best value," it must offer the best combination of price, reliability of supply, and flexibility, consistent with Peoples' obligation as a public utility to provide safe, adequate and efficient service to the general public. Through a competitive bidding process, Peoples has a portfolio of supply sources from numerous third-party suppliers that reflect balance between cost, reliability and operational flexibility.
Q. Could Peoples purchase all third party supplies in advance for a long term at the lowest available fixed price in order to provide increased stability to its cost of gas?
A. No. Peoples' quantity requirements for system supply gas vary significantly from year to year, season to season, month to month and, in particular, from day to day. The demand for gas on the Peoples system can often vary dramatically within a month from the lowest to the highest requirement of its customers. The actual takes of gas out of the Peoples system by transport customers
varies significantly from day to day. Since significant portions of the total transportation volumes are received by Peoples at a uniform daily rate, Peoples is forced to increase or decrease the volumes purchased for its own system supply by significant increments in order to maintain a balance between receipts and deliveries of gas each day. As a consequence, Peoples must buy a portion of its total system requirements under swing contract arrangements, and meet extreme variations in delivered volumes by relying on swing gas, peaking gas, pipeline balancing volumes and pipeline no notice service at the prevailing rates for such services.
Q. How did Peoples estimate the amount of gas to be purchased from various sources during the projected period of January 2015 through December 2015?
A. Peoples' projected gas purchases are based on the Company's preliminary total throughput of therms delivered to customers projected for 2015, including both sales of Peoples' system supply and transportation deliveries of third party gas purchased by end-users of Peoples. The throughput was then adjusted for the anticipated level of transportation service.
Q. How are revenues derived from Peoples' Swing Service Charge accounted for through the PGA?
A. Customers who participate in the NaturalChoice program pay a Swing Service Charge. The Swing Service Charge covers costs included in the PGA for balancing the difference between marketer-supplied gas and the customers' actual consumption. The revenues from the Swing Service Charge are credited to the PGA to offset this expense.
Q. Is Peoples seeking a change in the Swing Service Charge?
A. Not at this time. However, to the extent a portion of the swing costs are assigned to the PGA, Peoples may seek to readdress its Swing Service Charge expenses and the allocation thereof in a subsequent docket before the Commission.
Q. How did you estimate the purchase price to be paid by Peoples for each of its available sources of gas supply?
A. The price to be paid for natural gas is estimated based on an evaluation of historical prices for gas delivered to the FGT, Southern, and Gulfstream systems, futures
contracts as reported on the New York Mercantile Exchange and forecasts of market prices for the projection period of January 2015 through December 2015. These prices are then adjusted to reflect the potential for implied volatility increases and unexpected and unforeseen increases due to market forces particularly in the monthly and daily markets for natural gas prices in the projection period.
Q. Referring to Schedules E-3 (A) through (G) of Composite Exhibit KMF-2, please explain the components of these schedules and the assumptions that were made in developing the Company's projections.
A. Schedule E-3 (G) is a compilation of the monthly data that appears on Schedules E-3 (A) through (F) for the corresponding months of January 2015 through December 2015. In Schedules E-3 (A) through (F), Column (A) indicates the applicable month for all data on the page. In Column (B), "FGT" indicates that the volumes are to be purchased from third party suppliers for delivery via FGT interstate pipeline transportation. "SOUTHERN" indicates that the volumes are to be purchased from a third party supplier for delivery via Southern interstate pipeline transportation. "GULFSTREAM"
indicates that the volumes are to be purchased from a third party supplier for delivery via Gulfstream interstate pipeline transportation. "THIRD PARTY" indicates that the volumes are to be purchased directly from various third party suppliers for delivery into FGT, Southern, or Gulfstream.

In Column (C), "PGS" means the purchase will be for Peoples' system supply and will become part of Peoples' total WACOG. None of the costs of gas or transportation for end-use purchases made by end-use customers of Peoples are included in Peoples' WACOG. In Column (D), purchases of pipeline transportation services from FGT under Rate Schedules FTS-1 and FTS-2 are split into two components, commodity (or "usage") and demand (or "reservation"). Both Peoples and end-users pay the usage charge based on the actual amount of gas transported. The FTS-1 and FTS-2 commodity costs shown include all related transportation charges including usage, fuel and ACA charges. The FTS-1 and FTS-2 demand component is a fixed charge based on the maximum daily quantity of FTS-1 and FTS-2 firm transportation capacity reserved. Similarly, the transportation rates of Southern and Gulfstream also consist of two components, a usage charge and a reservation charge. Individual

Transportation Service customers reimburse Peoples or directly pay FGT for all pipeline reservation charges associated with the transportation capacity that Peoples reserves and uses on their behalf.

Also in Column (D), "NO NOTICE TRANSPORTATION SERVICE" (or "NNTS") means FGT's no notice service provided to Peoples on a fixed charge basis for use when Peoples' actual use exceeds scheduled quantities. "SWING SERVICE" means the demand and commodity component of the cost of third party supplies purchased to meet Peoples "swing" requirements for supply that fluctuate on a day-to-day basis. "COMMODITY" means third party purchases of gas transported on FGT, Southern or Gulfstream and does not include any purchases of sales volumes from FGT.

Column (E) shows the monthly quantity in therms of gas purchased by Peoples for each category of system supply. Column (F) shows the gas purchased by end-users for transportation.

Column (G) is the total of Columns (E) and (F) in each row.

Columns (H), (I), (J) and (K) show the corresponding third party supplier commodity costs, pipeline transportation commodity costs, pipeline transportation
reservation costs, and other charges (e.g., balancing charges), respectively. These costs are determined using the actual amounts paid by Peoples. In the case of end-user transportation, these costs are reimbursed to Peoples or paid directly to FGT. All ACA and fuel charges are included in the commodity costs in Column (I) and, therefore, are not shown in Column (K). Column (L) in each row is the sum of Columns (H), (I), (J) and (K) divided by Column (G).
Q. Please explain the components of these schedules and the assumptions that were made in developing the Company's projections.
A. Schedule E-1 is shown in three versions. Page 18 relates to Cost of Gas Purchased, Therms Purchased, and Cents Per Therm for Combined Rate Classes, Page 19 relates to Residential Customers, and Page 20 relates to Commercial Customers.

The costs associated with various categories or items are shown on lines 1 through 14. Line 6 on Schedule E-1 includes legal expenses associated with various interstate pipeline dockets such as tariff filings, seasonal fuel filings and certification proceedings. In
addition, legal and consulting expenses have been included because FGT is scheduled to file a rate proceeding no later than November 1, 2014. The increased rates will be effective as of May 2015. These expenses have historically been included for recovery through the Purchased Gas Adjustment Clause because they are fuel related expenses. The volumes consumed for similar categories or items are shown on lines 15 through 27, and the resulting effective cost per therm rate for each similar category or item is contained on lines 28 through 45.

The data shown on Schedule E-1 are taken directly from Schedules E-3 (A) through (F) for the months of January 2015 through December 2015.
Q. What information is presented on Schedule $E-1 / R$ of Composite Exhibit KMF-2?
A. Schedule E-1/R of Composite Exhibit KMF-2 shows seven months actual and five months estimated data for the current period from January 2014 through December 2014 for all combined customer classes.
Q. What information is presented on Schedule E-2 of

Composite Exhibit KMF-2?
A. Schedule E-2 of Composite Exhibit KMF-2 shows the amount of the prior period over/under recoveries of gas costs that are included in the current PGA calculation.
Q. What is the purpose of Schedule E-4 of Composite Exhibit KMF-2?
A. Schedule E-4 of Composite Exhibit KMF-2 simply shows the calculation of the estimated true-up amount for the January 2014 through December 2014 period. It is based on actual data for seven months and projected data for five months.
Q. What information is contained on Schedule E-5 of Composite Exhibit KMF-2?
A. Schedule E-5 of Composite Exhibit KMF-2 is statistical data that includes the projected therm sales and numbers of customers by customer class for the period from January 2015 through December 2015.
Q. How have you incorporated the Residential PGA factor and the Commercial PGA factor in the derivation of the PGA
cap for which the company seeks approval?
A. On April 5, 1998, the Commission issued Order No. PSC-99-0634-FOF-GU as a Proposed Agency Action in Docket No. 981698-GU, and the Order subsequently became final. This Order approved Peoples Gas' request for approval of a methodology for charging separate Purchased Gas Adjustment factors for different customer classes. Under the approved methodology, separate PGA factors are derived by assigning the fixed, interstate pipeline reservation costs to each customer class according to the class' contribution to the company's peak month demand for the winter season and the summer season. Exhibit KMF-2, Page 39, labeled Attachment, contains the seasonal peak allocation factors based on the most recent peak month data available, February 2014 and April 2014. These allocation factors are then applied to Schedule E-1 to derive the Residential, Commercial and Combined for All Rate Classes. The WACOG for which Peoples seeks approval as the annual cap is the Residential factor of $\$ .98354$ per therm as shown in Schedule E-1. This annual cap will be applicable to all rate classes.
Q. Does this conclude your testimony?
A. Yes, it does.

# PEOPLES GAS SYSTEM SCHEDULES SUPPORTING PURCHASED GAS ADJUSTMENT PROJECTION FILING FOR <br> January 2015 - December 2015 

## PURCHASED GAS ADJUSTMENT (PGA)

INDEX
SCHEDULE TITLE ..... PAGE
E-1 Original Estimate for the Period - Jan-Dec 2015 ..... 18
E1/R Revised Estimate for the Period - Jan-Dec 2014 ..... 21
E-2 Calculation of True-Up Amount for Current Period - Jan-Dec 2014 ..... 24
E-3 Transportation Purchases System Supply and End Use ..... 25
E-4 Calculation of True-Up Amount for Projected Period - Jan-Dec 2015 ..... 37
E-5 Therm Sales and Customer Data ..... 38
Attachment Demand Allocation Factors for Summer and Winter ..... 39




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## PEOPLES GAS SYSTEM <br> PURCHASED GAS ADJUSTMENT COST RECOVERY CLAUSE CALCULATION

Docket No. 140003-GU

## PGA CAP 2015

Exhibit KMF-2, Page 1 of 1
ORIGINAL ESTIMATE FOR THE PROJECTED PERIOD: JANUARY '15 through DECEMBER '15
Attachment

|  | Demand Allocation Factors-Winter Season |  | Demand Allocation Factors-Summer Season |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Peak Month February 2014 Actual Sales | Percent of Total | Current Month <br> April 2014 <br> Actual Sales | Percent of Total |
| Residential | 10,311,740.9 |  | 5,941,769.8 |  |
| Residential PGA Factor | 10,311,740.9 | 68.16\% | 5,941,769.8 | 60.58\% |
| Residential Gen 1 | 496,348.8 |  | 414,558.9 |  |
| Residential Gen 2 | 155,105.5 |  | 112,485.8 |  |
| Residential Gen 3 | 0.0 |  | 0.0 |  |
| Natural Gas Vehicles | 4,584.9 |  | 2,494.7 |  |
| Commercial Street Lighting | 5,212.9 |  | 5,165.3 |  |
| Small General Service | 663,726.8 |  | 460,848.6 |  |
| Commercial Stand By Gen | 8,866.4 |  | 8,251.6 |  |
| General Service-1 | 1,654,533.3 |  | 1,399,810.2 |  |
| General Service-2 | 1,219,324.3 |  | 995,470.1 |  |
| General Service-3 | 356,093.9 |  | 268,323.7 |  |
| General Service-4 | 27,402.2 |  | 68,361.9 |  |
| General Service-5 | 29,904.7 |  | 25,375.7 |  |
| Small Interruptible | 48,200.2 |  | 11,478.4 |  |
| Interruptible | 0.0 |  | 0.0 |  |
| Large Interruptible | 0.0 |  | 0.0 |  |
| Wholesale | 147,032.1 |  | 93,489.6 |  |
| Commercial PGA Factor | 4,816,336.0 | 31.84\% | 3,866,114.5 | 39.42\% |
| Total System | 15,128,076.9 | 100.00\% | 9,807,884.3 | 100.00\% |

