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September 12, 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. 140004-GU – Natural gas conservation cost recovery

Dear Ms. Stauffer:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find Peoples' Preliminary List of Issues and Positions.

We appreciate your usual assistance.

Andrew M. Brown

AB/aw Attachments

cc: Parties of Record

Ms. Kandi M. Floyd

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural gas conservation cost)	DOCKET NO. 140004-GU
recovery.)	Submitted for filing:
)	9-12-14

PEOPLES GAS SYSTEM'S PRELIMINARY LIST OF ISSUES AND POSITIONS

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Preliminary List of Issues and Positions:

Generic Conservation Issues

ISSUE 1: What are the final conservation cost recovery true-up amounts for the period January 2013 through December 2013?

PGS: \$1,701,763 underrecovery

<u>ISSUE 2</u>: What are the total conservation cost recovery amounts to be collected during the period January 2015 through December 2015?

PGS: \$14,565,181

ISSUE 3: What are the conservation cost recovery factors for the period January 2015 through December 2015?

PGS:

Rate Class Residential Residential Standby Generator Small General Service	ECCR Factor (per therm) \$0.09207 \$0.09207 \$0.05398
Commercial Standby Generator	\$0.02767
General Service 1	\$0.02767
General Service 2	\$0.02010
General Service 3	\$0.01666
General Service 4	\$0.01243
General Service 5	\$0.00908
Commercial Street Lighting	\$0.01459
Natural Gas Vehicle Service	\$0.01737

<u>ISSUE 4</u>: What should be the effective date of the new conservation cost recovery factors for billing purposes?

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2015 through December 2015. Billing cycles may start before January 1, 2015, and the last cycle may be read after December 31, 2015, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

Respectfully submitted,

Andrew M. Brown

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Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Preliminary List of Issues and Positions has been furnished by electronic mail this 12th day of September, 2014, to the following:

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