



FILED OCT 04, 2016 DOCUMENT NO. 07966-16 FPSC - COMMISSION CLERK

Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

October 4, 2016

E-Portal/Electronic Filing

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

Re: Docket No. 160003-GU - Purchased gas adjustment (PGA) true-up.

Dear Ms. Stauffer:

Attached for filing, please find the Prehearing Statement of Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade.

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

Sincerely,

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

MEK cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

)

)

In re: Purchased Gas Adjustment (PGA) True-up Docket No. 160003-GU

Filed: October 4, 2016

FLORIDA PUBLIC UTILITIES COMPANY AND FLORIDA PUBLIC UTILITIES COMPANY-FORT MEADE'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-16-0104-PCO-GU, Florida Public Utilities Company and Florida Public Utilities Company-Fort Meade (jointly,

"FPUC") hereby submits its Prehearing Statement.

A. <u>Known Witnesses</u>

FPUC intends to offer the direct testimony of Michelle Napier, as filed on May 2, 2016, and August 19, 2016.

Michelle Napier Issues 1 - 5

B. Known Exhibits

FPUC intends to sponsor the following exhibits:

Napier	MDN-1	Final Fuel Over/Under Recovery (Schedule A-
		7)
Napier	MDN-2	Schedules E-1, E-1/R, E-2,
		E-3, E-4, E-5

Docket No. 160003-GU Page 2

C. <u>Basic Position</u>

FPUC has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-5.

D. – F. <u>Issues</u>

FPUC's positions on the issues identified for hearing are as follows:

Issue 1:	What are the final purchased gas adjustment true-up amounts for the period January 2015 through December 2015?	
<u>FPUC:</u>	An under-recovery of \$1,970,827, inclusive of interest.	
Issue 2:	What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2016 through December 2016?	
<u>FPUC:</u>	An over-recovery of \$1,642,359, inclusive of interest.	
Issue 3:	What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2016 through December 2016?	
<u>FPUC:</u>	An under-recovery of \$328,468 to be collected.	
<u>Issue 4:</u>	What are the levelized purchased gas cost recovery (cap) factors for the period January 2016 through December 2016?	
FPUC:	The appropriate PGA factor is 98.148 cents per therm.	

Docket No. 160003-GU Page 3

<u>Issue 5:</u> What should be the effective date of the new purchased gas adjustment charge for billing purposes?

FPUC:The factors should be effective for all meter readings on or after January 1,
2017 and should apply for bills rendered for meter readings taken between
January 1, 2017 and December 31, 2017.

- ISSUE 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?
- <u>FPUC:</u> Yes. The Commission should approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised tariffs are consistent with the Commission's decision.

G. <u>Stipulated Issues</u>

While not a party to stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

H. <u>Pending Motions</u>

None at this time.

I. <u>Pending Confidentiality Requests</u>

None.

Docket No. 160003-GU Page 4

J. <u>Compliance With Order on Procedure</u>

Florida Public Utilities Company has fully complied with the requirements of the Order on Procedure, Order No. PSC-16-0104-PCO-GU.

K. <u>Objections to Witness Qualifications</u>

Florida Public Utilities Company has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 4th day of October, 2016.

het Keta

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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail to the following parties of record this 4th day of October, 2016:

Florida Public Utilities Company	MacFarlane Ferguson Law Firm
Mike Cassel	Ansley Watson, Jr./Andrew Brown
1750 S 14 th Street, Suite 200	P.O. Box 1531
Fernandina Beach, FL 32034	Tampa, FL 33601-1531
mcassel@fpuc.com	aw@macfar.com/AB@macfar.com
Margo Leathers, Esquire	Office of Public Counsel
Florida Public Service Commission	J.R. Kelly/Patricia Christensen
2540 Shumard Oak Boulevard	c/o The Florida Legislature
	111 West Madison Street
Tallahassee, FL 32399	Room 812
mleather@psc.state.fl.us	
	Tallahassee, FL 32399-1400
	Kelly.JR@leg.state.fl.us
	Christensen.Patty@leg.state.fl.us
Peoples Gas System	St. Joe Natural Gas Company, Inc.
Paula K. Brown/Kandi Floyd	Mr. Andy Shoaf
P.O. Box 111	P.O. Box 549
Tampa, FL 33601-0111	Port St. Joe, FL 32457-0549
regdept@tecoenergy.com	Andy@stjoegas.com
kfloyd@tecoenergy.com	
Florida City Gas	AGL Resources Inc.
Carolyn Bermudez	Elizabeth Wade
933 East 25 th Street	Ten Peachtree Place
Hialeah, FL 33013-3498	Location 1470
cbermudez@aglresources.com	Atlanta, GA 30309
	ewade@aglresources.com
Blake O'Farrow, Director	
Regulatory Affairs/Florida and Tennessee	
AGL Resources	
10 Peachtree Place	
Location 1686	
Atlanta, GA 30309	
bofarrow@aglresources.com	
€	

Jeri Kele

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