BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)	Docket No. 160003-GU
(PGA) True-up)	
)	Filed: October 4, 2016

FLORIDA CITY GAS COMPANY'S PREHEARING STATEMENT

Pursuant to the requirements of the Order on Procedure, Order No. PSC-16-0104-PCO-GU, as modified by Order No. PSC-16-0265-PCO-GU, and Order No. PSC-16-0394-PCO-PU, Florida City Gas hereby submits its Prehearing Statement.

A. Known Witnesses

Florida City Gas intends to offer the 2015 true-up testimony of Thomas Kaufmann, as filed on May 2, 2016, as well as the true-up factor testimony of Mr. Kaufmann, which was submitted on August 18, 2016.

Thomas Kaufmann Issues 1-6

B. Known Exhibits

Florida City Gas intends to sponsor the following exhibits:

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

C. <u>Basic Position</u>

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 are as follows:

<u>Issue 1:</u> What are the final purchased gas adjustment true-up amounts for the period January 2015 through December 2015?

Florida City Gas: An over-recovery of \$979,356.

<u>Issue 2:</u> What are the actual/estimated purchased gas adjustment true-up amounts for

the period January 2016 through December 2016?

Florida City Gas: An under-recovery of \$2,292,715.

<u>Issue 3:</u> What are the total purchased gas adjustment true-up amounts to be collected

during the period January 2017 through December 2017?

Florida City Gas: An under-recovery of \$1,313,360, for a true-up refund factor of 3.244 cents

per therm.

Issue 4: What are the levelized purchased gas cost recovery (cap) factors for the

period January 2017 through December 2017?

Florida City Gas: Based on the winter months of October through March the appropriate (cap)

factors are 81.658 cents per therm before the regulatory assessment fees are added and 82.068 cents per therm with regulatory assessment fees included.

<u>Issue 5:</u> 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,

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?

Florida City Gas: 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. 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

Florida City Gas has no pending requests for confidentiality.

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

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 4th day of October, 2016.

Gregory M. Munson

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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 to the following parties of record this 4th day of October, 2016:

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