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September 10, 2018

BY E-PORTAL/ELECTRONIC FILING

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

Re: Docket No. 20180003-GU – Purchased Gas Adjustment (PGA) True-Up

Dear Ms. Stauffer:

Attached for filing, please find Florida City Gas' Preliminary Statement of Issues and Positions in the above-referenced docket.

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,

A handwritten signature in blue ink, appearing to read 'G. Munson'.

Gregory Munson
Gunster, Yoakley & Stewart, P.A.
215 South Monroe St., Suite 601
Tallahassee, FL 32301
(850) 521-1713

cc: Parties of Record

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment)
(PGA) True-up.)
_____)

Docket No. 20180003-GU

File: September 10, 2018

FLORIDA CITY GAS'
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS

The following is the preliminary statement of issues and positions filed on behalf of
Florida City Gas:

ISSUE 1: What are the final purchased gas adjustment true-up amounts for the period
January 2017 through December 2017?

Florida City Gas: The final net true-up amount (including interest and
applicable regulatory assessment fees) for the period January 2017 through
December 2017 is an over-recovery of \$1,160,543.

ISSUE 2: What are the actual/estimated purchased gas adjustment true-up amounts for the
period January 2018 through December 2018?

Florida City Gas: The projected true-up (based on actual data for six months
and projected data for six months) for the current period January 2018 through
December 2018 is an under-recovery of \$1,578,371.

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected during the period January 2019 through December 2019?

Florida City Gas: The total net purchased gas adjustment true-up amount is an under-recovery of \$417,828, for a true-up charge factor of 1.082 cents per therm to be collected during the period January 2019 through December 2019.

ISSUE 4: What are the levelized purchased gas cost recover (cap) factors for the period January 2019 through December 2019?

Florida City Gas: The maximum levelized purchased gas cost recovery (cap) factor based on the Company's expected winter cost of gas is 71.375 cents per therm before the regulatory assessment fees, and 71.734 cents per therm after the regulatory assessment fees.

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, 2019 and should apply for bills rendered for meter readings taken between January 1, 2019 and December 31, 2019.

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.

RESPECTFULLY SUBMITTED this 10th day of September, 2018.



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Attorneys for Florida City Gas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing has been furnished by Electronic Mail or US Mail to the following parties of record this 10th day of September 2018:

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