

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Purchased gas adjustment
(PGA) true-up

DOCKET NO. 20170003-GU
FILED: October 15, 2018

PREHEARING STATEMENT OF THE OFFICE OF PUBLIC COUNSEL

The Citizens of the State of Florida, through the Office of Public Counsel, pursuant to the Order Establishing Procedure in this docket, Order PSC-2018-0114-PCO-GU issued March 1, 2018 and Order PSC-2018-0248-PCO-PU issued May 14, 2018, submit this Prehearing Statement.

APPEARANCES:

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c/o The Florida Legislature
111 West Madison Street, Room 812
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On behalf of the Citizens of the State of Florida.

A. **WITNESSES:**

None.

B. **EXHIBITS:**

None.

C. **STATEMENT OF BASIC POSITION**

The utilities have the burden of proof to justify and support the recovery of costs and their proposal(s) seeking the Commission's adoption of policy statements (whether new or

changed) or other affirmative relief sought, regardless of whether the Interveners provide evidence to the contrary. Regardless of whether the Commission has previously approved a program as meeting the Commission's requirements, the utilities must still meet their burden of demonstrating that the costs submitted for final recovery meet the statutory test(s) and are reasonable in amount and prudently incurred.

D. STATEMENT OF FACTUAL ISSUES AND POSITIONS

GENERIC PURCHASED GAS ADJUSTMENT ISSUES

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

OPC: No position at this time.

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

OPC: No position at this time.

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

OPC: No position at this time.

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

OPC: No position at this time.

ISSUE 5: What should be the effective date of the new purchased gas adjustment charge for billing purposes be?

OPC: No position at this time.

ISSUE 6: Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?

OPC: No position at this time.

ISSUE 7: Should the 2019 PGA tax savings credit proposed by FCG be applied to customer's bills in 2019?

OPC: The tax savings credit should be applied to FCG customer bills consistent with the agreement filed in Docket No. 20180154-GU.

E. **STIPULATED ISSUES:**

None.

F. **PENDING MOTIONS:**

None.

G. **REQUESTS FOR CONFIDENTIALITY**

Citizens have no pending requests for claims for confidentiality.

H. **OBJECTIONS TO QUALIFICATIONS**

None.

I. **REQUIREMENTS OF ORDER**

There are no requirements of the Order Establishing Procedure with which the Office of Public Counsel cannot comply.

Dated this 15th day of October, 2018.

Respectfully submitted,

JR Kelly
Public Counsel



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CERTIFICATE OF SERVICE
20180003-GU

I HEREBY CERTIFY that a true and correct copy of the Office of Public Counsel's Prehearing Statement has been furnished by electronic mail on this 15th day of October, 2018, to the following:

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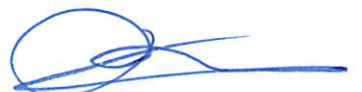
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