

Writer's E-Mail Address: bkeating@gunster.com

August 21, 2019

**VIA E-PORTAL**

Mr. Adam Teitzman  
Commission Clerk  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

**Re: Docket No. 20190004-GU – Natural Gas Conservation Cost Recovery**

Dear Mr. Teitzman:

Enclosed for electronic 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 or concerns.

Sincerely,



Beth Keating  
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MEK

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Natural Gas Conservation Cost  
Recovery

Docket No. 20190004-GU  
Filed: August 21, 2019

**FLORIDA CITY GAS'S  
PRELIMINARY STATEMENT OF ISSUES AND POSITIONS**

**ISSUE 1:** What are the final conservation cost recovery adjustment true-up amounts for the period January 2018 through December 2018?

**Florida City Gas:** The final net true-up amount (including interest, adjustments, and the estimated under-recovery included in the 2019 NGCCR Factor) for the period January 2018 through December 2018 is an under-recovery of \$371,437. *See* FCG Exhibit MB-1.

**ISSUE 2:** What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2019 through December 2019?

**Florida City Gas:** The Actual/Estimated True-Up (based on actual data for six months and projected data for six months) for the current period January 2019 through December 2019 is an over-recovery of \$217,026. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 8. The interest on this over-recovery is \$2,841. *See* FCG Exhibit MB-2, Schedule C-3, page 5, line 10.

**ISSUE 3:** What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2020 through December 2020?

**Florida City Gas:** The total net true-up (inclusive of the final true-up for 2018, the Actual/Estimated True-Up for 2019, and interest) to be collected from January 2020 through December 2020 is an under-recovery of \$151,570. *See* FCG Exhibit MB-2, Schedule C-3, page 4, line 12.

**ISSUE 4:** What are the total conservation cost recovery amounts, net of the true-up amount, to be collected during the period January 2020 through December 2020?

**Florida City Gas:** Applying the total net true-up results in a total of \$5,530,433 of energy conservation program costs to be collected during the period January 2020 through December 2020. *See* FCG Exhibit MB-2, Schedule C-1.

**ISSUE 5:** What are the conservation cost recovery factors for the period January 2020 through December 2020?

**Florida City Gas:** The appropriate factors are:

<u>Rate Class</u>	<u>CCR Factor (\$/per therm)</u>
RS-1	\$0.25062
RS-100	\$0.13092
RS-600	\$0.08309
GS-1	\$0.05075
GS-6K	\$0.03725
GS-25K	\$0.03646
Gas Lights	\$0.05891
GS-120K	\$0.02379

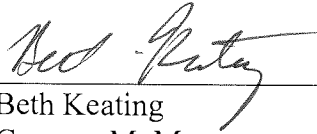
**ISSUE 6:** Should the Commission approve revised tariffs reflecting the natural gas conservation cost recovery amounts and establishing natural gas conservation cost recovery factors determined to be appropriate in this proceeding?

**Florida City Gas:** Yes. The Commission should approve revised tariffs reflecting the new energy conservation cost 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.

**ISSUE 7:** What should be the effective date of the new conservation cost recovery factors for billing purposes?

**Florida City Gas:** The new conservation cost recovery factors should be effective for all meter readings on or after January 1, 2020 and should apply to bills rendered for meter readings taken between January 1, 2020 and December 31, 2020.

Respectfully submitted this 21<sup>st</sup> day of August, 2019.



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*Attorneys for Florida City Gas*

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic or US Mail to the following parties of record this 21<sup>st</sup> day of August, 2019:

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