

ATTORNEYS & COUNSELORS AT LAW EST. 1884

One Tampa City Center, Suite 2000 201 N. Franklin Street P.O. Box 1531 (33601) Tampa, FL 33602 813.273.4200 Fax: 813.273.4396

WWW.MFMLEGAL.COM
EMAIL: INFO@MFMLEGAL.COM

625 Court Street, Suite 200 P.O. Box 1669 (33757) Clearwater, FL 33756 727.441.8966 Fax: 727.442.8470

In Reply Refer to:

Tampa ab@macfar.com

October 7, 2020

VIA E-PORTAL FILING

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

Re: Docket No. 20200003-GU - Purchased gas adjustment (PGA) true-up

Dear Mr. Teitzman:

Attached for electronic filing in the above docket on behalf of Peoples Gas System, please find its Prehearing Statement.

Your assistance in this matter is greatly appreciated.

Sincerely,

Andrew M. Brown

AB/plb Attachment

cc: Parties of Record Ms. Kandi M. Floyd

Ms. Karen Bramley

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment)	DOCKET NO. 20200003-GU
(PGA) true-up.)	Submitted for filing:
)	10-7-20

PEOPLES GAS SYSTEM'S PREHEARING STATEMENT

Peoples Gas System ("PGS"), by its undersigned attorneys, submits the following Prehearing Statement for the hearing scheduled to be held in the above docket commencing November 3, 2020.

A. <u>WITNESSES</u>

<u>Witness</u>	Subject Matter	<u>Issues</u>
(Direct)		
Karen L. Bramley (PGS)	Projected gas costs, therm sales and weighted average cost of gas ("WACOG"); final PGA true-up amount for January 2019 - December 2019; estimated PGA true-up amounts for January 2020 – December 2020; total PGA true-up amount for January 2020 – December 2020; and levelized PGA cost recovery (cap) factor for January 2021 – December 2021	1-6

B. <u>EXHIBITS</u>

Exhibit	<u>Witness</u>	<u>Description</u>
(KLB-1)	Bramley	Calculation of final true-up for January 2019 – December 2019 (Schedule A-7)
KLB-2)	Bramley	Calculation of estimated true-up for January 2020 – December 2020; total

true-up for January 2019 – December 2019); calculation of PGA factor for January 2021 – December 2021 (Schedules E-1 through E-5)

C. <u>STATEMENT OF BASIC POSITION</u>

PGS's Statement of Basic Position:

The Commission should approve PGS's final PGA true-up amount of \$3,844,599 over-recovery for the period January 2019 through December 2019; its actual/estimated PGA true-up amount of \$2,556,956 under-recovery for the period January 2020 through December 2020; and its levelized PGA (cap) factor of \$1.03639 per therm for the period January 2021 through December 2021. (Bramley)

D. <u>STATEMENT OF ISSUES AND POSITIONS</u>

Generic Purchased Gas Adjustment Issues

ISSUE 1: What are the final purchased gas adjustment true-up amounts for the period January 2019 through December 2019?

PGS: \$3,844,599 over-recovery (Bramley)

ISSUE 2: What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2020 through December 2020?

PGS: \$2,556,956 under-recovery (Bramley)

ISSUE 3: What are the total purchased gas adjustment true-up amounts to be collected or refunded during the period January 2021 through December 2021?

PGS: The amount to be refunded is \$1,287,643. (Bramley)

<u>ISSUE 4</u>: What are the levelized purchased gas cost recovery (cap) factors for the period January 2021 through December 2021?

PGS: \$1.03639 per therm (Bramley)

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

<u>PGS</u>: The charge should be effective beginning with the specified purchased gas cost recovery cycle and thereafter for the period

January 2021 through December 2021. Billing cycles may start before January 1, 2021, and the last cycle may be read after December 31, 2021, so that each customer is billed for twelve months regardless of when the adjustment charge became effective. (Bramley)

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

<u>PGS</u>: 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. (Bramley)

ISSUE 7: Should this docket be closed?

PGS: Yes, Docket No. 20200003-GU should be closed once the Commission's decisions on all of the issues in the docket have become final and the Commission has concluded that the docket has otherwise met the requirements for closure.

E. STIPULATED ISSUES

None as to PGS.

F. PENDING MOTIONS

None as to PGS.

G. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

PGS has no pending confidentiality claims or requests at this time.

H. COMPLIANCE WITH ORDER ESTABLISHING PROCEDURE

PGS has complied with all requirements of the Order Establishing Procedure in this docket.

Dated this 7th day of October, 2020.

Respectfully submitted,

<u>/s/ Andrew M. Brown, Esq.</u> Andrew M. Brown, Esq.

Phone: (813) 273-4209 E-mail: ab@macfar.com Thomas R. Farrior, Esq. Phone: (813) 273-4396 E-mail: trf@macfar.com

Macfarlane Ferguson & McMullen

P. O. Box 1531

Tampa, Florida 33601-1531

Attorneys for Peoples Gas System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 7th day of October 2020, to the following:

Kurt Schrader
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850
kschrade@psc.state.fl.us

Office of Public Counsel
J.R. Kelly/Patricia Christensen
c/o The Florida Legislature
111 West Madison St., Room 812
Tallahassee, FL 32399-1400
kelly.jr@leg.state.fl.us
christensen.patty@leg.state.fl.us

Mike Cassel Florida Public Utilities Company 208 Wildlight Avenue Yulee, FL 32097 mcassel@fpuc.com

Kurt Howard
Florida City Gas
700 Universe Boulevard
Juno Beach, FL 33408
Kurt.howard@nexteraenergy.com

Beth Keating, Esquire Gunster Law Firm 215 South Monroe St. Suite 601 Tallahassee, FL 32301 bkeating@gunster.com

Kandi Floyd / Paula K. Brown Regulatory Affairs Peoples Gas System P. O. Box 111 Tampa, FL 33601-0111 kfloyd@tecoenergy.com regdept@tecoenergy.com

Mr. Andy Shoaf St. Joe Natural Gas Company, Inc. P. O. Box 549 Port St. Joe, FL 32457-0549 andy@stjoegas.com

Christopher T. Wright
Florida Power & Light Company
700 Universe Boulevard
Juno Beach, FL 33408
Christopher.Wright@fpl.com

/s/ Andrew M. Brown, Esq. Andrew M. Brown, Esq.