

Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

October 7, 2020

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

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

Dear Mr. Teitzman:

Attached for electronic filing, please find the Prehearing Statement.

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,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

**MEK** 

cc: Parties of Record

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased Gas Adjustment (PGA) True-up			)	Docket No. 20200003-GU		
			Filed: October 7, 2020	)		
I				AND FLORIDA PUBLIC UEHEARING STATEMENT	TILITIES	
	Pursuant	to the requireme	nts of the Order	on Procedure, Order No. PS	SC-2020-0040	
PCC	-GU, issued	January 31, 2020	, Florida Public I	Itilities Company and Florida	Public Utilitie	
Com	npany-Fort M	Ieade (jointly, "FF	UC") hereby sub	omits its Prehearing Statement.		
A.	<u>Appearan</u>	ces				
Gun: 215 Talla (850	South Monro hassee, FL 3 ) 521-1706	v & Stewart, P.A. pe St., Suite 601 32301 rida Public Utilitie	s Company			
В.	Known Witnesses					
	FPUC intends to offer the direct testimony of Derrick M. Craig, as filed on May 4, 2020 and Witness Craig's and Jeffrey B. Bates's direct testimonies, filed on August 7, 2020.					
	De	errick M. Craig		Issue 1		
	Derrick M. Craig		,	Issues $3-6$		
	Jeffrey B. Bates			Issues 3 and 4		
C.	Known Exhibits					
	FPUC intends to sponsor the following exhibits:					
	Craig DMC-1 Fin		Final Fuel Ove	nal Fuel Over/Under Recovery (Schedule A- Issue 1		
			7)			
	Craig	DMC-2	Schedules E-1,	E-1/R, E-2, E-3, E-4, E-5	Issues 3-6	

### D. Basic Position

FPUC has appropriately calculated its true-up amounts and purchased gas adjustment factor as shown in the Company's positions on Issues 1-6 and asks that the Commission approve the Company's proposed PGA Factor for 2021.

### E. -G Issues

FPUC's positions on the issues identified for hearing are as follows:

Issue 1:	What are the final purchased gas adjustment true-up amounts for the period January 2019 through December 2019?
FPUC:	An over-recovery of \$884,793, inclusive of interest.
Issue 2:	What are the actual/estimated purchased gas adjustment true-up amounts for the period January 2020 through December 2020?
FPUC:	An over-recovery of \$938,564, inclusive of interest.
Issue 3:	What are the total purchased gas adjustment true-up amounts to be collected (refunded) during the period January 2021 through December 2021?
FPUC:	An over-recovery of \$1,823,357to be refunded.
Issue 4:	What are the levelized purchased gas cost recovery (cap) factors for the period January 2021 through December 2021?
<u>FPUC:</u>	The appropriate PGA factor is 99.587¢ cents per therm.
Issue 5:	What should be the effective date of the new purchased gas adjustment charge for billing purposes?
FPUC:	The factors should be effective for all meter readings on or after January 1, 2021 and should apply for bills rendered for meter readings taken between January 1, 2021 and December 31, 2021.
<u>Issue 6:</u>	Should the Commission approve revised tariffs reflecting the new purchased gas adjustment charges determined to be appropriate in this proceeding?
FPUC:	Yes. The Commission should approve revised tariffs reflecting the new

tariffs are consistent with the Commission's decision.

purchased gas adjustment charges determined to be appropriate in this proceeding. The Commission should direct staff to verify that the revised

Docket No. 20200003-GU Page 3

Issue 7:

Should this docket be closed?

FPUC:

This is a continuing cost recovery docket, and should remain an active and ongoing proceeding. As such, a new docket number should be established annually to reflect the new calendar year.

#### G. Stipulated Issues

While not a party to stipulations at this time, FPUC believes that it should be possible to reach a stipulation on each of the issues as they pertain to FPUC.

#### Н. Pending Motions

None at this time.

#### I. Pending Confidentiality Requests

None.

#### J. Compliance With Order on Procedure

Florida Public Utilities Company has fully complied with the requirements of the Order on Procedure, Order No. PSC-2020-0040-PCO-GU.

#### Objections to Witness Qualifications K.

Florida Public Utilities Company has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 7th day of October, 2020.

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

Attorneys for Florida Public Utilities

Company

## **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 7th day of October, 2020:

Florida Public Utilities Company	MacFarlane Ferguson Law Firm
Mike Cassel	Andrew Brown/Thomas Farrior
208 Wildlight Ave.	P.O. Box 1531
Yulee FL 32097	Tampa, FL 33601-1531
mcassel@fpuc.com	AB@macfar.com
<u>measset@ipue.com</u>	trf@macfar.com
Vunt Sahradan Esquira	Office of Public Counsel
Kurt Schrader, Esquire Florida Public Service Commission	1
2540 Shumard Oak Boulevard	J.R.Kelly/Patricia Christensen
	c/o The Florida Legislature
Tallahassee, FL 32399	111 West Madison Street, Room 812
kschrade@psc.state.fl.us	Tallahassee, FL 32399-1400
	Rehwinkel.Charles@leg.state.fl.us
	Christensen.Patty@leg.state.fl.us
Peoples Gas System	St. Joe Natural Gas Company, Inc.
Paula Brown/Kandi Floyd	Andy Shoaf
P.O. Box 111	P.O. Box 549
Tampa, FL 33601-0111	Port St. Joe, FL 32457-0549
regdept@tecoenergy.com	Andy@stjoegas.com
kfloyd@tecoenergy.com	
Florida City Gas	Christopher T. Wright
Kurt Howard	Fla. Auth. House Counsel No. 1007055
Senior Director and General Manager	Florida Power & Light Company
700 Universe Boulevard	700 Universe Boulevard (JB/LAW)
Juno Beach, FL 33408	Juno Beach, Florida 33408
Kurt.Howard@FPL.com	

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706