

**BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION**

In re: Conservation Cost Recovery ) Docket No. 20170004-GU  
Clause )  
\_\_\_\_\_ ) Filed: October 4, 2017

**FLORIDA CITY GAS COMPANY'S  
PREHEARING STATEMENT**

Pursuant to the requirements of the Order on Procedure, Order No. PSC-2017-0110-PCO-GU, Florida City Gas hereby submits its Prehearing Statement.

**A. Known Witnesses**

Florida City Gas intends to offer the testimony of Miguel Bustos filed on April 20, 2017, as well as the Testimony of Mr. Bustos submitted on August 10, 2017.

Miguel Bustos (Direct) Issues: 1 - 6

**B. Known Exhibits**

Florida City Gas intends to sponsor the following exhibits:

Bustos (Direct) MB-1 Schedules CT-1, CT-2, CT-3, and CT-6<sup>1</sup>

Bustos (Direct) MB-2 Schedules C-1, C-2, C-3, and C-5

**C. Basic Position**

The Company's true-up amounts and conservation cost recovery factors as shown in Issues 1 through 6 are appropriate and should be approved and become effective.

**D. – F. Issues**

Issue 1: What are the final conservation cost recovery true-up amounts for the period January 2016 through December 2016?

---

<sup>1</sup> Amended May 12, 2017.

Florida City Gas: An over-recovery of \$325,523 calculated based upon an end-of-period net true up over-recovery of \$673,445

Issue 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2017 through December 2017?

Florida City Gas: An over-recovery of \$599,751

Issue 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from January 2018 through December 2018?

Florida City Gas: An over-recovery of \$925,274

Issue 4: What are the total conservation cost recovery amounts to be collected during the period January 2018 through December 2018?

Florida City Gas: A total of \$4,383,452 in conservation costs.

Issue 5: What are the conservation cost recovery factors for the period January 2018 through December 2018?

Florida City Gas: The appropriate factors are:

RATE CLASS	RATE/\$ PER THERM
GS-1, GS-100, GS-220, RSG, CSG (Sales & Transportation)	\$0.12996
GS-600 (Sales & Transportation)	\$0.06042
GS-1200 (Sales & Transportation)	\$0.03710
GS-6k (Sales & Transportation)	\$0.03098
GS-25000 (Sales & Transportation)	\$0.03071
GS-60000 (Sales & Transportation)	\$0.02928
Gas Lights	\$0.05981
GS-120000 (Sales & Transportation)	\$0.02168
GS-250000 (Sales & Transportation)	\$0.02024

Issue 6: Should the Commission approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy 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 conservation cost recovery factors for billing purposes?

Florida City Gas: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2018 through December 2018. Billing cycles may start before January 1, 2018 and the last cycle may be read after December 31, 2018, so that each customer is billed for twelve months regardless of when the adjustment factor became effective.

**G. Stipulated Issues**

Florida City Gas is not a party to any stipulations at this time, although it believes that it should be possible to reach a stipulation on each of the above issues as they relate to Florida City Gas.

**H. Pending Motions**

Florida City Gas has no pending motions or other matters requiring attention at this time.

**I. Pending Confidentiality Requests**

None.

**J. Compliance With Order on Procedure**

Florida City Gas believes that this Prehearing Statement fully complies with the requirements of the Order on Procedure.

**K.** Objections to Witness Qualifications

Florida City Gas has no objection to the qualifications of any expert witness.

RESPECTFULLY SUBMITTED this 3<sup>rd</sup> day of October, 2017.



---

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

**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 3<sup>rd</sup> day of October, 2017:

Mr. Ansley Watson, Jr.  
Mr. Andrew M. Brown  
Macfarlane Ferguson & McMullen  
P.O. Box 1531  
Tampa, Florida 33601-1531  
[aw@macfar.com](mailto:aw@macfar.com)  
[ab@macfar.com](mailto:ab@macfar.com)

Mr. J.R. Kelly  
Mr. Charles J. Rehwinkel  
Ms. Patricia A. Christensen  
Office of Public Counsel  
c/o The Florida Legislature  
111 W. Madison Street, Room 812  
Tallahassee FL 32399-1400  
[kelly.jr@leg.state.fl.us](mailto:kelly.jr@leg.state.fl.us)  
[rehwinkel.charles@leg.state.fl.us](mailto:rehwinkel.charles@leg.state.fl.us)  
[christensen.patty@leg.state.fl.us](mailto:christensen.patty@leg.state.fl.us)

Ms. Carolyn Bermudez  
Florida City Gas  
933 East 25<sup>th</sup> Street  
Hialeah FL 33013  
[cbermude@southernco.com](mailto:cbermude@southernco.com)

Ms. Paula M. Sparkman  
Messer Caparello, P.A.  
P.O. Box 15579  
Tallahassee FL 32317  
[psparkman@lawfla.com](mailto:psparkman@lawfla.com)

Mr. Mike Cassel, Regulatory Affairs  
Florida Public Utilities Company  
FPUC Indiantown Division  
Florida Division of Chesapeake Utilities  
Corp.  
FPUC Fort Meade  
1750 S.W. 14<sup>TH</sup> Street, Suite 200  
Fernandina Beach, FL 32034  
[MCassel@fpuc.com](mailto:MCassel@fpuc.com)

Mr. Andy Shoaf  
Energy Conservation Analyst  
St. Joe Natural Gas Company, Inc.  
P.O. Box 549  
Port St. Joe, FL 32457-0549  
[andy@stjoegas.com](mailto:andy@stjoegas.com)

Ms. Kandi M. Floyd  
Ms. Paula Brown  
Regulatory Affairs  
Peoples Gas Systems  
P.O. Box 111  
Tampa, Florida 33601-0111  
[kfloyd@tecoenergy.com](mailto:kfloyd@tecoenergy.com)  
[regdept@tecoenergy.com](mailto:regdept@tecoenergy.com)

Mr. Jerry H. Melendy Jr.  
Sebring gas System, Inc.  
3515 U.S. Highway 27 South  
Sebring FL 33870-5452  
[jmelendy@floridasbestgas.com](mailto:jmelendy@floridasbestgas.com)

Ms. Elisabeth Wade  
Mr. Blake O'Farrow  
SOUTHERN COMPANY GAS  
Ten Peachtree Place  
Location 1470  
Atlanta GA 30309  
[ewade@southernco.com](mailto:ewade@southernco.com)  
[bafarrow@southernco.com](mailto:bafarrow@southernco.com)

Kelley Corbari/Stephanie Cuello  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399  
[kcorbari@psc.state.fl.us](mailto:kcorbari@psc.state.fl.us)  
[scuello@psc.state.fl.us](mailto:scuello@psc.state.fl.us)



---

Gregory M. Munson  
Beth Keating  
Gunster, Yoakley & Stewart, P.A.  
215 South Monroe St., Suite 601  
Tallahassee, FL 32301  
[gmunson@gunster.com](mailto:gmunson@gunster.com)  
[bkeating@gunster.com](mailto:bkeating@gunster.com)  
*Attorneys for Florida City Gas*