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August 6, 2021
VIA E-PORTAL FILING
Adam J. Teitzman, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Re: Docket No. 20210003-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 the following:

- Petition of Peoples Gas System for Approval of PGA Factor for Application to Bills to be Rendered During the Period January 2022 through December 2022;
- Direct Testimony of Karen L. Bramley; and
- Composite Exhibit KLB-2, consisting of Schedules E-1, E-1/R, E-2, E-3, E-4 and E-5.

The enclosed testimony and exhibit will be offered by Peoples at the hearing in this docket scheduled to commence on November 2, 2021.

Your assistance in this matter is greatly appreciated.

AB/plb


Attachments
$\begin{array}{ll}\text { cc: } & \text { Parties of Record } \\ & \text { Ms. Kandi M. Floyd } \\ & \text { Ms. Karen Bramley }\end{array}$

## BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Purchased gas adjustment ) (PGA) true-up.

DOCKET NO. 20210003-GU
Submitted for filing: 8/6/2021

## PETITION OF PEOPLES GAS SYSTEM FOR APPROVAL OF PGA FACTOR FOR APPLICATION TO BILLS TO BE RENDERED DURING THE PERIOD JANUARY 2022 THROUGH DECEMBER 2022

Peoples Gas System ("Peoples"), by its undersigned attorneys, hereby files its petition for approval of its purchased gas adjustment ("PGA") factor to be applied to bills beginning the first billing cycle in January 2022 through the last billing cycle in December 2022, inclusive, and in support thereof says:

1. The name of the petitioner and the mailing address of its principal office are:

Peoples Gas System
P.O. Box 2562

Tampa, Florida 33601-2562
2. The names and mailing address of the persons authorized to receive notices and communications with respect to this petition are:

| Andrew M. Brown | Ms. Paula K. Brown |
| :--- | :--- |
| Macfarlane Ferguson \& McMullen | Regulatory Affairs |
| P.O. Box 1531 | Peoples Gas System |
| Tampa, Florida 33601-1531 | P.O. Box 111 |
| Ms. Karen L. Bramley | Tampa, Florida 33601-0111 |
| Manager, Regulatory Affairs |  |
| Peoples Gas System |  |
| P.O. Box 2562 |  |
| Tampa, Florida 33601-2562 |  |

3. By its Orders Nos. 24463 and 24463-A in this docket, the Commission adopted a revised method for the recovery of purchased gas costs by regulated natural gas
utilities, to be used for the recovery of such costs commencing October 1, 1991. Submitted herewith is Peoples' Composite Exhibit KLB-2, consisting of Schedules E-1, E-1/R, E-2, E-3, E-4 and E-5. The schedules in Composite Exhibit KLB-2 are used to compute a maximum PGA factor for application to bills rendered for gas sold by Peoples during the twelve-month period of January 2022 through December 2022 (the "Projection Period").
4. The maximum PGA factor calculated in Composite Exhibit KLB-2 basically represents $(A)$ the sum of the final net true-up amount for the period January 1, 2020 through December 31, 2020, the estimated or projected true-up (based on actual data for six months and projected data for six months) for the period January 1, 2021 through December 31, 2021, both true-up amounts including interest, and Peoples' projected cost of purchased gas for the Projection Period, without interest, (B) divided by Peoples' projected therm sales for the Projection Period.
5. By its Order No. PSC-99-0634-FOF-GU in Docket No. 981698-GU the Commission approved a methodology for charging separate Purchased Gas Adjustment Factors for different customer classes. On February 22, 2016, by its Order No. PSC-16-0081-PAA-GU in Docket No. 150218-GU, the Commission approved Peoples' methodology to discontinue charging multiple PGA factors for different classes of customers. The maximum (cap) PGA factor for which Peoples seeks approval for the Projection Period is the factor shown on Line 44 of Schedule E-1 of Composite Exhibit KLB-2, and is $\$ 1.19163$ per therm.

WHEREFORE, Peoples Gas System respectfully requests that the Commission enter its order approving Peoples' proposed maximum (cap) PGA factor of $\$ 1.19163$ per therm for application to bills beginning the first billing cycle in January 2022 through the last billing cycle in December 2022.

Respectfully submitted,


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Tampa, Florida 33601-1531
Attorneys for Peoples Gas System

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that true and correct copies of the foregoing petition, together with copies of the Direct Testimony of Karen L. Bramley and Composite Exhibit KLB-2, have been furnished by electronic mail this 6th day of August, 2021, to the following:

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PEDPLES GAS AN EMERA CDMPANY

BEFORE THE
FLORIDA PUBLIC SERVICE COMMISSION

DOCKET NO. 20210003-GU
PURCHASED GAS ADJUSTMENT (PGA) BY PEOPLES GAS SYSTEM

## TESTIMONY AND EXHIBIT <br> OF

KAREN L. BRAMLEY

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION PREPARED DIRECT TESTIMONY <br> OF 

## KAREN L. BRAMLEY

Q. Please state your name, business address, by whom you are employed, and in what capacity?
A. My name is Karen L. Bramley. My business address is 702 North Franklin Street, Tampa, Florida 33602. I am employed by Peoples Gas System ("Peoples" or the "Company") as the Manager, Regulatory Affairs.
Q. Please describe your educational and employment background.
A. I graduated from the University of South Florida in 1990 with a Bachelor of Arts degree in Political Science and from University of South Florida in 1993 with a Master's degree in Public Administration. My work experience includes twenty-four years of gas and electric utility experience. My utility work has included various positions in Legal, Customer Service, Fuels Management and Regulatory. In my current position, I am responsible for Peoples Gas System's Purchased Gas Adjustment ("PGA")

Clause and Natural Gas Conservation Cost Recovery ("NGCCR") Clause as well as various other regulatory activities for Peoples.
Q. What is the purpose of your testimony in this docket?
A. The purpose of my testimony is to describe generally the components of Peoples' cost of purchased gas and upstream pipeline capacity. In my testimony, I also explain how Peoples' projected weighted average cost of gas ("WACOG") for the January 2022 through December 2022 period was determined and the resulting requested maximum PGA ("Cap").
Q. Please summarize your testimony.
A. I will address the following areas:

1. How Peoples will obtain its gas supplies during the projected period.
2. Estimates and adjustments used to determine the amount of gas to be purchased from Peoples' various available sources of supply during the projected period. 3. Projections and assumptions used to estimate the purchase price to be paid by Peoples for such gas
supplies.
3. The components and assumptions used to develop Peoples' projected WACOG including the projected true-up balance to be collected or refunded.
Q. What is the appropriate final purchased gas adjustment true-up amount for the period January 2020 through December 2020?
A. The final PGA true-up amount for the year 2020 is an over-recovery of $\$ 599,738$.
Q. What is the estimated purchased gas adjustment true-up amount for the period January 2021 through December 2021?
A. As shown on Schedule E-4, the estimated PGA true-up amount for 2021 is an under-recovery of $\$ 8,332,074$.
Q. What is the total purchased gas adjustment true-up amount to be collected during the period January 2022 through December 2022?
A. The total PGA true-up amount to be collected in 2022 is an under-recovery of $\$ 7,732,336$.
Q. Have you prepared or caused to be prepared certain schedules for use in this proceeding?
A. Yes. Composite Exhibit $K L B-2$ was prepared by me or under my supervision.
Q. Please describe how Peoples will obtain its gas supplies during the projected period of January 2021 through December 2021.
A. Natural gas delivered through Peoples' distribution system is currently received through three interstate pipelines and one intrastate pipeline. Gas is delivered through Florida Gas Transmission Company ("FGT"), through Southern Natural Gas Company ("Southern"), through Gulfstream Natural Gas System ("Gulfstream") and through SeaCoast Gas Transmission ("SeaCoast"). Receiving gas supply through multiple upstream pipelines provides valuable flexibility and reliability to serve customers.
Q. In general, how does Peoples determine its sources of supply?
A. Peoples evaluates, selects, and utilizes sources of
natural gas supply based on its "best value" gas acquisition strategy. For a source of supply to be identified as a "best value," it must offer the best combination of price, reliability of supply, and flexibility, consistent with Peoples' obligation as a public utility to provide safe, adequate, and efficient service to the public. Through a competitive bidding process, Peoples has a portfolio of supply sources from numerous third-party suppliers that reflect balance between cost, reliability, and operational flexibility.
Q. Could Peoples purchase all third-party supplies in advance for a long term at the lowest available fixed price to provide increased stability to its cost of gas?
A. No. Peoples' quantity requirements for system supply gas vary significantly from year to year, season to season, month to month, and from day to day. The demand for gas on the Peoples system can often vary dramatically within a month from the lowest to the highest requirement of its customers. The actual takes of gas out of the Peoples system by transport customers varies significantly from day to day. Since significant portions of the total transportation volumes are received by Peoples at a uniform daily rate, Peoples is
forced to increase or decrease the volumes purchased for its own system supply by significant increments to maintain a balance between receipts and deliveries of gas each day. Therefore, Peoples must buy a portion of its total system requirements under swing contract arrangements and meet extreme variations in delivered volumes by relying on swing gas, peaking gas, pipeline balancing volumes and pipeline no notice service at the prevailing rates for such services.
Q. How did Peoples estimate the amount of gas to be purchased from various sources during the projected period of January 2022 through December 2022?
A. Peoples' projected gas purchases are based on the Company's preliminary total throughput of therms delivered to customers projected for 2022, including both sales of Peoples' system supply and transportation deliveries of third-party gas purchased by end-users of Peoples. The throughput was then adjusted for the anticipated level of transportation service.
Q. How are revenues derived from Peoples' Swing Service Charge accounted for through the PGA?
A. Customers who participate in the Natural Choice program pay a Swing Service Charge. The Swing Service Charge covers costs included in the PGA for balancing the difference between marketer-supplied gas and the customers' actual consumption. The revenues from the Swing Service Charge are credited to the PGA to offset this expense.
Q. How did you estimate the purchase price to be paid by Peoples for each of its available sources of gas supply?
A. Peoples estimates natural gas prices based on an evaluation of historical prices for gas delivered to the FGT, Southern, and Gulfstream systems. For the projection period of January 2022 through December 2022, Peoples uses natural gas futures settlement prices as traded on the New York Mercantile Exchange, averaged over five consecutive business days in July 2021 to forecast natural gas price. The price projection is then adjusted to reflect the potential for unexpected and unforeseen changes due to market forces for natural gas prices in the projection period.
Q. What drivers have contributed to the recent increase in the price of natural gas?
A. The cold weather event associated with Winter Storm Uri that occurred in February caused the Texas energy infrastructure chain to experience significant stress during the storm, causing daily cash prices for natural gas to set records across much of the U.S. In the aftermath of this unprecedented event, the price of natural gas decreased. However, starting in May and continuing into July, the current and forward price for natural gas has continued to increase. Unlike the temporary natural gas price movements Peoples experienced in February, with Winter Storm Uri, the increases seen since May are expected to be a fundamental market shift that continues for the current year and into 2022. The drivers of this change are low natural gas storage levels, high demand for liquefied natural gas exports, extreme weather, and low production growth.
Q. Referring to Schedules E-3 (A) through (G) of Composite Exhibit KLB-2, please explain the components of these schedules and the assumptions that were made in developing the Company's projections.
A. Schedule $E-3$, column (G) is a compilation of the annual data that appears on Schedules $E-3$ ( $E$ ) through ( $F$ ) for
the year ending December 31, 2022. In Column (B), "FGT" indicates that the volumes are to be purchased for delivery via $F G T$ interstate pipeline transportation. "SONAT" indicates that the volumes are to be purchased for delivery via Southern interstate pipeline transportation. "GULFSTREAM" indicates that the volumes are to be purchased for delivery via Gulfstream interstate pipeline transportation. "SEACOAST" indicates the volumes are to be purchased for delivery via SeaCoast intrastate pipeline transportation. "Sabal Trail" indicates the volumes are to be purchased from third-party suppliers for delivery via Sabal Trail interstate pipeline. "THIRD PARTY" indicates that the volumes are to be purchased directly from various thirdparty suppliers for delivery into FGT, Southern, Gulfstream or Sabal Trail.

In Column (C), "PGS" means the purchase will be for Peoples' system supply and will become part of Peoples' total WACOG. None of the costs of gas or transportation for end-use purchases made by end-use customers of Peoples are included in Peoples' WACOG. In Column (D), purchases of pipeline transportation services from FGT under Rate Schedules FTS-1, FTS-2, and FTS-3 are split into two components, commodity (or "usage") and demand
(or "reservation"). Both Peoples and end-users pay the usage charge based on the actual amount of gas transported. The FTS-1, FTS-2, and FTS-3 commodity costs shown include all related transportation charges including usage, fuel, and ACA charges. The FTS-1, FTS2, and FTS-3 demand component is a fixed charge based on the maximum daily quantity of FTS-1, FTS-2, and FTS-3 firm transportation capacity reserved. Similarly, the transportation rates of Southern and Gulfstream consist of two components, a usage charge and a reservation charge, and SeaCoast and Sabal Trail consist of one component, a reservation charge. Individual Transportation Service customers reimburse Peoples or directly pay the upstream pipeline for all pipeline reservation charges associated with the transportation capacity that Peoples reserves and uses on their behalf.

Also, in Column (D), "NO NOTICE TRANSPORTATION SERVICE" (or "NNTS") means FGT's no notice service provided to Peoples on a fixed charge basis for use when Peoples' actual use exceeds scheduled quantities. "SWING SERVICE" means the demand and commodity component of the cost of third-party supplies purchased to meet Peoples "swing" requirements for supply that fluctuate on a day-to-day basis. Column (E) shows the annual quantity in therms of
gas purchased by Peoples for each category of system supply.

Column ( $F$ ) shows the gas purchased by end-users for transportation. Column (G) is the total of Columns (E) and (E) in each row. Columns (H), (I), (J) and (K) show the corresponding third-party supplier commodity costs, pipeline transportation commodity costs, pipeline transportation reservation costs, and other charges (e.g., balancing charges), respectively. These costs are determined using the actual amounts paid by Peoples. In the case of end-user transportation, these costs are reimbursed to Peoples or paid directly to FGT. All ACA and fuel charges are included in the commodity costs in Column (I) and, therefore, are not shown in Column (K). Column (L) in each row is the sum of Columns (H), (I), (J) and (K) divided by Column (G).
Q. Did FGT file a rate case in 2021?
A. Yes, FGT filed a rate proceeding on February 1, 2021 with the Federal Energy Regulatory Commission ("EERC") seeking to increase the transportation rates it charges its customers.
Q. How did Peoples reflect the impact of $\mathrm{FGT}^{\prime}$ s rate case in the filing?
A. The proposed rate increase associated with the FGT proceeding is effective as of August 2021 and is reflected in the PGA CAP filing for the projection period.
Q. Please explain the components of these schedules and the assumptions that were made in developing the Company's projections.
A. Schedule E-1 shows the Cost of Gas Purchased, Therms Purchased, and Cents Per Therm for all rate classes.

The costs associated with various categories or items are shown on lines 1 through 14. Line 6 on Schedule $E-1$ includes legal expenses associated with various interstate pipeline dockets, such as tariff filings, seasonal fuel filings, and certification proceedings. These expenses have historically been included for recovery through the Purchased Gas Adjustment Clause because they are fuel-related expenses. The volumes consumed for similar categories or items are shown on lines 15 through 27, and the resulting effective cost
per therm rate for each similar category or item is contained on lines 28 through 45. The data shown on Schedule $E-1$ is calculated from Schedules E-3 (A) through (F) for the year ending December 31, 2022.
Q. What information is presented on Schedule $E-1 / R$ of Composite Exhibit KLB-2?
A. Schedule $E-1 / R$ of Composite Exhibit KLB-2 shows six months actual and six months estimated data for the current period from January 2021 through December 2021 for all customer classes.
Q. What information is presented on Schedule E-2 of Composite Exhibit KLB-2?
A. Schedule E-2 of Composite Exhibit $K L B-2$ shows the amount of the prior period over/under recoveries of gas costs that are included in the current PGA calculation.
Q. What is the purpose of Schedule E-4 of Composite Exhibit KLB-2 ?
A. Schedule E-4 of Composite Exhibit KLB-2 shows the calculation of the estimated true-up amount for the

January 2021 through December 2021 period. It is based on actual data for six months and projected data for six months.
Q. What information is contained on Schedule $\mathrm{E}-5$ of Composite Exhibit KLB-2?
A. Schedule E-5 of Composite Exhibit $\mathrm{KLB}-2$ is statistical data that includes the projected therm sales and numbers of customers by customer class for the period from January 2022 through December 2022.
Q. What is the appropriate cap factor for which Peoples seeks approval?
A. The WACOG for which Peoples seeks approval as the annual cap is a factor of $\$ 1.19163$ per therm as shown in Schedule E-1. This annual cap will be applicable to all rate classes.
Q. Does this conclude your testimony?
A. Yes, it does.

# PEOPLES GAS SYSTEM SCHEDULES SUPPORTING PURCHASED GAS ADJUSTMENT PROJECTION FILING FOR <br> January 2022 - December 2022 

15

## PURCHASED GAS ADJUSTMENT (PGA)

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| SCHEDULE | TITLE | 17 |
| E-1 | Original Estimate for the Period - Jan-Dec 2021 | 18 |
| E1/R | Revised Estimate for the Period - Jan-Dec 2020 | 21 |
| E-2 | Calculation of True-Up Amount for Current Period - Jan-Dec 2020 | 22 |
| E-3 | Transportation Purchases System Supply and End Use Calculation | 23 |
| E-4 | of True-Up Amount for Projected Period - Jan-Dec 2021 Therm | 24 |








[^0]| COMPANY: PEOPLES GAS SYSTEM SCHEDULE E-4 <br> ERIOD: JANUARY'22 through DECEMBER'22 | CALCULATION OF TRUE-UP AMOUNTPROJECTED PERIOD |  |  | Docket No. 20210003-GU PGA CAP 2022 <br> Exhibit KMF-2, Page 1 of 1 |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | PRIOR PERIOD: JAN '20-DEC '20 |  |  | CURRENT PERIOD: JAN '21-DEC' 21 |  |
|  |  | (2) ACTUAL | (3) (2)-(1) <br> DIFFERENCE | (4) 6 MOS. ACT. 6 MOS. REVISED EST. | $\begin{aligned} & \text { (3)+(4) } \\ & \text { TOTAL } \end{aligned}$ <br> TRUE-UP |
| 1 TOTAL THERM SALES \$ | \$106,486,052 | \$122,166,701 | \$15,680,649 | \$143,630,399 | \$159,311,048 |
| 2 TRUE-UP PROVISION FOR THIS PERIOD | $(\$ 2,705,006)$ | (\$2,115,166) | \$589,840 | (\$8,386,634) | (\$7,796,794) |
| 2a MISCELLANEOUS ADJUSTMENTS | \$84,559 | \$94,274 | \$9,715 | \$53,284 | \$62,999 |
| 3 INTEREST PROVISION FOR THIS PERIOD | \$63,491 | \$63,674 | \$183 | \$1,276 | \$1,459 |
| 3a TRUE-UP (COLLECTED) OR REFUNDED | \$0 | \$0 | \$0 | \$0 | \$0 |
| 4 END OF PERIOD TOTAL NET TRUE-UP | (\$2,556,956) | (\$1,957,218) | \$599,738 | (\$8,332,074) | (\$7,732,336) |

NOTE: SIX MONTHS ACTUAL SIX MONTHS REVISED ESTIMATE DATA OBTAINED FROM CURRENT PERIOD SCHEDULE (E-2).

COL.(1)SAME AS COL. (4 Less Line 3a) PRIOR PER. SCH.(E-4) COL.(2)DATA OBTAINED FROM DEC'20 SCHEDULE (A-2) LINE 4 COLUMN (2) SAME AS LINE 7 SCHEDULE (A-7), Dec'20
LINE 4 COLUMN (3) SAME AS LINE 9 SCHEDULE (A-7), Dec'20 LINE 2 COLUMN (4) SAME AS LINE 7 SCHEDULE (E-2)
LINE 2a COLUMN (4) SAME AS LINEs 10a + 11a SCHEDULE (E-2)
LINE 2a COLUMN (4) SAME AS LINEs 10a + 11a SCHED
LINE 3 COLUMN (4) SAME AS LINE 8 SCHEDULE (E-2)

| TOTAL TRUE-UP \$ <br> PROJ. TH. SALES | equals | CENTS PER THERM TRUE-UP |
| ---: | :---: | :---: |
| $(\$ 7,732,336)$  <br> $132,811,365$ equals |  |  |



[^1]
[^0]:    EXHIBIT KLB-2, SCHEDULE E-3

[^1]:    PGA 2022 CAP EXHITIT KLB-2, SCHEDULE E-5

