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October 5, 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. 20210004-GU - Natural gas conservation cost recovery

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
Paula K. Brown
Kandi M. Floyd
Karen Bramley
Thomas R. Farrior, Esq.

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Natural Gas Conservation)
Cost Recovery Clause.)
_____)

DOCKET NO. 20210004-GU
FILED: October 5, 2021

**PREHEARING STATEMENT
OF PEOPLES GAS SYSTEM**

A. APPEARANCES:

Andrew M. Brown
Thomas R. Farrior
Macfarlane Ferguson & McMullen
P. O. Box 1531
Tampa, Florida 33601-1531
On behalf of Peoples Gas System

B. WITNESSES:

| Witness | Subject Matter | Issues # |
|------------------|---|-----------------|
| Direct | | |
| Karen L. Bramley | Conservation Cost Recovery True-Up and Projection; Peoples Gas System's company specific issues | 1-8 |

C. EXHIBITS:

| Witness | Proffered By | Exhibit # | Description |
|------------------|---------------------|-----------------------------|---|
| Direct | | | |
| Karen L. Bramley | Peoples Gas System | KLB-1, filed May 3, 2021 | Schedules supporting cost recovery factor, actual January 2020 – December 2020 |
| Karen L. Bramley | Peoples Gas System | KLB-2, filed August 6, 2021 | Schedules supporting conservation costs projected for the period January 2022 – December 2022 |

D. STATEMENT OF BASIC POSITION

Peoples Gas System's Statement of Basic Position:

The Commission should determine that Peoples Gas System has properly calculated its conservation cost recovery true-up and projections and the natural gas conservation cost recovery factors set forth in the testimony and exhibits of Witness Karen L. Bramley during the period January 2022 through December 2022.

E. STATEMENT OF ISSUES AND POSITIONS

GENERIC CONSERVATION COST RECOVERY ISSUES

ISSUE 1: What are the final conservation cost recovery adjustment true-up amounts for the period January 2020 through December 2020?

PGS: An adjusted net true-up under-recovery of \$732,504, including interest. (Witness: Bramley)

ISSUE 2: What are the appropriate conservation adjustment actual/estimated true-up amounts for the period January 2021 through December 2021?

PGS: An under-recovery of \$2,078,274, including interest. (Witness: Bramley)

ISSUE 3: What are the appropriate total conservation adjustment true-up amounts to be collected/refunded from the period January 2022 through December 2022?

PGS: A collection of \$2,810,778, including interest. (Witness: Bramley)

ISSUE 4: What are the total conservation cost recovery amounts to be collected during the period January 2022 through December 2022?

PGS: \$26,011,848 (including current period estimated true-up). (Witness: Bramley)

ISSUE 5: What are the conservation cost recovery factors for the period January 2022 through December 2022?

PGS: For the period January 2022 through December 2022 the cost recovery factors are as follows:

| <u>Rate Schedule</u> | <u>Cost Recovery Factors</u> <u>(Dollars per Therm)</u> |
|----------------------------|--|
| RS & RS-SG & RS-GHP | 0.13116 |
| SGS | 0.08094 |
| GS-1 & CS-SG & CS-GHP | 0.04107 |
| GS-2 | 0.03100 |
| GS-3 | 0.02617 |
| GS-4 | 0.01901 |
| GS-5 | 0.01329 |
| CSLS (Witness: Bramley) | 0.02660 |

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?

PGS: Yes, the Commission should approve revised tariffs reflecting the energy conservation cost recovery amounts and establishing energy conservation cost recovery factors determined to be appropriate in this proceeding. (Witness: Bramley)

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

PGS: The factors should be effective beginning with the specified conservation cost recovery cycle and thereafter for the period January 2022 through December 2022. Billing cycles may start before January 1, 2022, and the last cycle may be read after December 31, 2022, so long as each customer is billed for 12 months regardless of when the factors became effective. (Witness: Bramley)

ISSUE 8: Should this docket be closed?

PGS: Yes, Docket No. 20210004-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.
(Witness: Bramley)

COMPANY-SPECIFIC CONSERVATION COST RECOVERY ISSUES

Peoples Gas System has no company-specific conservation cost recovery issues at this time.

F. STIPULATED ISSUES

Peoples Gas System is not aware of any stipulated issues as of this date.

G. PENDING MOTIONS

Peoples Gas System is not aware of any pending motions as of this date.

H. PENDING CONFIDENTIALITY CLAIMS OR REQUESTS

Peoples Gas System has no pending confidentiality claims or requests at this time.

I. OBJECTIONS TO WITNESS QUALIFICATIONS AS AN EXPERT

Peoples Gas System has no objections to any witness' qualifications as an expert in this proceeding.

J. COMPLIANCE WITH ORDER NO. PSC-2021-0076-PCO-GU

Peoples Gas System has complied with all requirements of the Order Establishing Procedure entered in this docket.

DATED this 5th day of October, 2021.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Andrew M. Brown".

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Attorneys for Peoples Gas
System

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Prehearing Statement filed on behalf of Peoples Gas System, has been furnished by electronic mail this 5th day of October 2021, to the following:

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